EMPLOYMENT AND ECONOMIC DEVELOPMENT

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 to the monthly Partner Express please contact your Grant Coordinator.

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 such 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 Individual Employment Plan/Action Plan. The participant plan should match the activities that are entered on the participant record in Workforce One. The definitions below are general definitions. Grantees should connect with their Grant Coordinator to align the approved work plan with ACP Workforce One activities.

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 IEP
Adult Diploma Program (ADP)	Training to obtain an Adult Diploma Program (ADP)	Attending a ADP program as a part of their IEP
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*	Opened as the initial enrollment activity when the participant has completed an assessment with program staff and is continually assessed throughout program	**ALL** – should be on all participant records
Basic Skills Instruction	This activity is to be used for participants accessing Adult Basic Education (ABE) services which include basic essential and educational skills	
Career Counseling*	Opened at the time the participant and Navigator/Counselor meet one-on-one to develop employment goals. See Case Management	**ALL** – should be on all participant records
Credentialed Coursework/Training	Used for training programs that DO provide an occupational skill credential at the completion of training. Training program must be Minnesota Office of Higher Education compliant	
Customized Cultural Program	Used for culturally specific training program	
Employed Full-Time	Full-time job placement that occurs during or at the completion of the program	32 hours or more per week
Employed Part-Time	Part-time job placement that occurs during or at the completion of the program	Less than 32 hours per week
ESL/ELL Training	Opened when participant is provided training in English as a second language/English language learner	Attending an ESL/ELL program as a part of their IEP
Financial Literacy Education	Opened when participant is provided training to develop skills for making informed decisions about personal finances	Included for anyone who utilizes FLE as a part of their IEP
GED Training	Opened when participant is provided training to obtain a General Educational Development diploma (GED)	Attending a GED program as a part of their IEP
Holding	This is only used as a placeholder while participant obtains the required eligibility documents for specific programs (DHP/Ex-Offender)	

Individual Plan Development*	Creating a participant plan to bridge the gap between an individual's skills and his/her goals. See Individual Employment Plan (IEP)/Employment Plan (EP)/Individual Service Strategy (ISS)/Action Plan/Individual Plan Development (IPD)	ALL – should be on all participant records
Integrated Education Training (IET)/Bridge Programs	Used for participant enrolled in Pathways to Prosperity (P2P) program Models 2 or 3 to indicate a credential or post-secondary credits will be attained at the completion of training. Training program must be Minnesota Office of Higher Education compliant	
Job Search	Used for participant who is actively seeking employment through submission of applications and interviewing	
Local Flag	The Local Flag activity is defined within each local agency for use at each own location's preference. This activity is not used to pull state-wide data	
Non-Credentialed Training	Used for training programs that DO NOT provide an occupational skill credential at the completion of training	
OJT - Public or Private	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 Work Experience	
On-Ramp Training	Used for participant enrolled in Pathways to Prosperity (P2P) program Models 1 to indicate a certificate will be attained at the completion of training	
Orientation	Used at the time participant attends group orientation sessions for enrollment into program	
Paid Work Experience	Used when a participant is in a temporary paid employment experience in the public, private nonprofit, or private sector	
Retention	Used 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 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	Used when a participant is in a temporary unpaid employment experience in the public, private nonprofit, or private sector	
Work Readiness Skills Training	Used 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 compete 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.

Assessments

This section does NOT apply to Displaced Homemaker Program. (DHP)

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 Individual Employment Plan (IEP) 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 objective 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 a bachelor's degree or above are except from this requirement.

Prior to January 2020, all participants in ACP programs were required to have an academic/grade level assessment and this assessment had to be completed at the time of enrollment. In response to grantee input, the Office of Adult Career Pathways relaxed these requirements in order to remove barriers to participants' receipt of services. Thus, **grade level/academic assessments are no longer required at the time of enrollment** but, as stated above, must be completed before a participant starts any certificate, credential, or post-secondary training.

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.
    - 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 should 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:

- Document all assessment results on the Individual Employment Plan (IEP);
- Enter the scores, in the form of a grade-level equivalents, in WF1 under *Assessment - Reading/Math Test;*
    - For participants who hold a Bachelor's degree, enter "88" after "Math and Reading Skills Grade Level" in WF1 (and are therefore exempt from the academic assessment).
- Retain a copy of the test results 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. If the participant has a four-year college degree or higher, or refuses to be tested, enter 88.0. If the participant has not tested and their math/reading level is obviously below the 5^{th} grade level, enter 87.0. **Use of 87 or 88 in place of an assessment must be specifically addressed in a corresponding case note.**

See: [*Credentials Training Consent for Release of Information*].

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 Individual Employment Plan (IEP).

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, telephone conversation, electronic message, or postal mail update from the participant)
- Case notes; within 15 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. See also: *Case Management.*

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 should 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 - face to face, individual, small/large group, text, chat, individual social media, mail, or phone call;
- Enrollment summary/Preliminary case note:
    - Participant current situation; including skills, barriers to gaining employment, work history, current work situation, family status, justification of enrollment,
    - Participant goals; including goals from IEP, 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

- Life events that may impact the customer's participation; i.e. changes in health (illness), family status, incarceration, housing situation…
- Individual 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.

Co-Enrollments

Note: this policy applies to the following grants: DEED SNAP E&T 50% Reimbursement, Displaced Homemaker Program (DHP), Legislative Direct Appropriations, Pathways to Prosperity Competitive Grant (P2P), Southeast Asian Economic Disparities Competitive grant, (Adult) Support Services grant, and Women's Economic Security Act (WESA) Competitive grant.

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. Co-enrollments are allowed within organizations and between organizations. Eligibility criteria and available resources in each program governs co-enrollment. When co-enrolling, always consider the following question: "*What can one program do that the other program cannot?*"

To co-enroll:

- Participant must meet the eligibility/enrollment requirements of ALL programs, and
- All enrollments need to be necessary and reasonable, and
- Each enrollment must provide a service that the other enrollment cannot, and/or
- Multiple enrollments are necessary to cover the participant costs.

Co-enrollments are designed to seamlessly provide participants with the services they need. Co-enrollments are not intended to increase program/Grantee outcomes. 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.

Duplicate billing is not allowed. Billing must be traceable to source.

Each co-enrollment must be specifically addressed and documented on the Individual Employment Plan (IEP) 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 Grantee.

Some examples 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.

- 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.
- Grant G is paying to send the participant through a Robotics program. Grant H is paying for the same Robotics program. Generally, co-enrollment would be allowable only if neither grant was able to cover all the participant's costs. Co-enrollment must be clearly justified in case notes

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 competitive contracts will enroll participants in to one ACP Program/Sequence and add activities with multiple funding streams. Beginning July 1, 2020 grantees with a Direct Appropriation contract will have the ability to enroll participants in to more than one ACP Program/Sequence with the corresponding Competitive and Direct Appropriation activities with funding stream(s).
Workforce One added a new field for Grantees where

- Direct Appropriation Reasons:
  - GED Training/Testing
  - Navigation Services
  - Retention Services
  - Support Services
  - Training Support

Credentialed Training Consent for Release and Exchange of Information

https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=414
This is a policy that is part of DEED Administration and applies to all Employment and Training programs.

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."

Cost Category Guidance

To determine how to charge against the correct cost category, click on this link Fiscal – Guidance on Cost Category Definitions.

Data Entry and Timeliness

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

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 Tennessen 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 *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.

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.

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

- Displaced Homemakers Program (DHP)
- Legislative Direct Appropriations
- Pathways to Prosperity Competitive Grant (P2P)
- Southeast Asian Economic Disparities Relief Competitive Grant
- Support Services Grant

- Women’s Economic Security Act (WESA) Competitive Grant

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.

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 IEP. 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.

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****

Participants must be exited 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 45 days.

Exit Reason Definitions

Exit Reason	Explanation
Cannot Locate	The participant has not responded to requests for contact for 90 days (or less, depending on local policy)
Completed Program Objective	The participant completed training, pre-employment skills, or other work plan objectives, though has not entered employment prior to exit
Death	The participant has passed away
Entered Armed Forces	The participant has enlisted in any branch of the military
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
Found Ineligible	The participant has not met the minimum eligibility requirements and must be exited
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 termination	The participant's exit reason does not match with any of the other reasons listed
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
Soft Termination	If the participant record has not been accessed in 90 days, the WF1 system will auto-exit for Soft Termination. This reason is not available for Grantee selection. See: Case Management

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. Participant's:

- legal name;
- date of birth;
- Social Security number.

Note: The "Face Page" may only be used as a placeholder for the Social Security number if the participant's full nine digit Social Security number is listed on the individual's "Face Page."

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.

Caution: Please be aware that if the participant does **not** provide allowable eligibility documentation within 90 days after the date of enrollment, the Grantee is responsible for all billing associated with the participant in question.

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 IEP:
   "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 IEP 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."
4. On day 91, if documentation is not acquired:
   a. Case note exit reason: "Participant was unable to provide (name specific eligibility element that is missing). Exited participant Found Ineligible."
   b. Close WF1 Activities.
   c. Exit participant from WF1 as "Found Ineligible."
   d. All costs associated with this participant are disallowed and must be backed out on the next Reimbursement Payment Request/Financial Status Report. Note exact amounts being back out of each category and why in the "SECTION 4: COMMENTS" section of the RPR.

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 gift cards provided directly to participants.

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

Incentives and Stipends

See*: [Support Services](#) and [Incentives and Stipends](#)*

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

https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=411
All Employment and Training program participants must have an Individual Employment Plan (IEP.)

The completion and implementation of an IEP/ISS/Action Plan/IPD (referred to as an IEP, moving forward) is an integral part of the delivery of Adult Career Pathways (ACP) services. The IEP is a document that is created jointly by the Grantee (Career Navigator) and the participant. The IEP 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 IEP 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 IEP.

A new IEP 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 in services. Consecutive program year grant; example SFY 2020 and SFY 2021.

A complete IEP must contain the following elements. The IEP must:

- be dated;
- list the participant's full legal name;
  Compare the name on the IEP 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/
- 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 participants barriers/support service plans
  - when an objective is completed

    - when an objective date has passed
- be signed and dated by the client;
- be signed and dated by a staff member;
- capture barrier(s) to employment and list training and Support Service plans/expenditures that will allow participants to overcome barriers; *Individual gas/bus cards do not need to be documented. The fact that transportation is a barrier and that you will be providing bus/gas cards does need to be documented*
- 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 an Objective Assessment in file;
- be accompanied by Reading/Math Assessment in file, if needed;
- 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.

Please see the DEED Individual Employment Plan policy for expanded information on these elements.

Workforce One
To capture the IEP Activity on the Activity screen in Workforce One, select "Individual Plan Development."

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

https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=558
This policy is part of overall DEED Administration and applies to all Employment and Training programs.

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 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.

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

Partnerships may be compensated or uncompensated. DEED encourages Grantees to partner with other area providers to provide the best service to participants. Compensated partners may also be referred to as *Subrecipients, Contractors or Vendors*.

Uncompensated partnerships are referred to as *Partners* and support the Grantees' program without charging program funds to do so.

In either instance, both must be listed within the Grantees' contract within the *Partnership Chart- All Partners*. All additions to the Partnership Chart within the Grantees' contract must request a modification/amendment to the contract to add/delete partners prior to issuing funds to the new compensated partner

See: Subrecipients, Contractors, and Vendors.

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 20th 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. **Submit all requests to 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.

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 IEP. 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 retained 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 completion of the maximum 90-day retention period.

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 "Documentation Needed to Support Participant Eligibility."

Selective Service Registration

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. (*Displaced Homemaker Program (DHP), Legislative 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

A **subrecipient (also called a subgrantee)** is an organization that receives a subaward from an ACP grantee in order to carry out a program for the purpose for which the grant was awarded. A subrecipient performs duties directly related to the grant, such as case management or readiness training. A subrecipient is paid from grant funds and is responsible for independently executing that part of the grant it has undertaken, complying with all requirements applicable to the grantee, and meeting the same performance standards to which the grantee is held. A grantee that has subrecipients/subgrantees is a referred to as a "pass-through entity."

Contractors and **vendors** both provide goods and services, such as office supplies or uniforms, which are ancillary to the work performed under a grant. Contractors and vendors typically operate in the marketplace, providing the similar goods and services to many purchasers. Vendors generally provide good or services at a set price, available to all comers. Contractors provide goods or services pursuant to the terms of a contract, so that the price may be negotiated. Contractors and vendors are not subject to requirements applicable to the grantee.

A grantee must monitor any of its subrecipients that receive over $50,000. DEED staff may request to review subrecipient contracts at any time and they will be reviewed at time of monitoring.   Adult Career Pathways uses the federal definition for the term "subrecipient." Therefore, grantees should carefully review the definition in order to correctly identify subrecipients.

Distinguishing subrecipients from vendors or contractors can be confusing. For example, an educational institution providing training to grant participants might be either a vendor, or a contractor, or a subrecipient. If a grantees pays an institution the same amount of tuition charged to members of the public for training a participant or participants, the institution is a vendor. If the grantee and the institution negotiate a price for the institution to provide training to participants, the institution is a contractor. If the grantee and the institution agree that the institution will undertake the training of participants in accordance with the terms of the grant for a portion of the grant funds, it is a subrecipient.

See: Partnership.

Support Services

For further information, see: Cost Category Guidance, and Incentives and Stipends.

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 IEP.

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 IEP, but before exiting the program.
- Costs must be reasonable.
- Costs must be necessary.
- Costs must be one-time or temporary payment, not ongoing. See Exceptions.
- Participants should complete a financial needs analysis (which may include a monthly budget, financial literacy assessment, etc.) for most support services.
- The Support Service must support the goals and objectives within the IEP, and must be documented.
- Each Support Service provided to a participant and its dollar amount must be documented in Workforce One.

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.

Allowable Support Services
Support Services must be allowable in accordance with the appropriate rules and regulations of the legislation/award. Grantees must refer to their Work Plans to determine *specifically* which Support Services are allowed. Adult Career Pathways will only pay for expenses incurred or obligated while a participant is enrolled in the program and actively participating in approved activities. See also Retention Services.

Support Services must be **necessary** and **reasonable** and may include, but are not limited to **participant**:

- Books, fees, clothing, tools, supplies for participants that are needed but not required for training, such as study materials, scrubs, supplemental learning materials, etc.
  Note: books, fees, clothing, and supplies *required* for a participant's training may be paid for using Direct Customer Training funds.
- Child and dependent care
- Clothing: Interview, work
- Driver's License fees (Automobile. Commercial Driver's License fees are an allowable Training expense.)
- Educational testing (for example, test prep courses and materials, practice exams, etc.)
- Emergency financial assistance
- Emergency health insurance
- Employment and training-related fees (for example, professional memberships, parking to attend in-state training, in-state conference/meeting fees, fees associated with conditions for training such as background checks or physical exams, application fees, etc.)
- Health and medical assistance
- Housing or rental assistance
- Internet bill, for participant
- Linkages/Referrals to community services
- Personal, drug, financial, and legal counseling
- Phone bill, for participant
- Professional memberships
- Reasonable accommodations for individuals with disabilities
- Relocation assistance
- Tools required for work
  Note: tools *required* for a participant's training may be paid for using Direct Customer Training funds.
- Transportation assistance (Bus or gas-only cards, mileage, reasonable and necessary car repair – if a car is necessary for work/school.)

Exceptions
Most regular, ongoing Support Services to participants are prohibited. DEED does allow the following regular support/payments, when a participant is actively engaged in a program activity and if *considered necessary for the participant to reach their program goal:*

- Bus, gas-only cards
- Child/dependent care
- Internet (for the time the participant is taking an on-line class)

- Mileage

Incentives are only allowed if they are part of the Grantee's approved Work Plan*.*

Support Services that are Not Allowable
Support Services may not include, but are not limited to:

- Any expense/service incurred, obligated, or distributed before:
  - the participant is enrolled, and
  - the participant and Career Navigator have both signed and dated the IEP, and
  - the need for Support Services has been documented
- Bad debt
- Contributions/Donations
- Entertainment
- Fees/Late fees/Interest
- Fines/Penalties/Settlements
- Most regular, on-going payments
  See also: Allowable Support Services
- Religious/Sectarian Activities
- Requests made after the participant has exited the program.
- Student activity costs.

Support Services are not intended to meet a participant's every need. Most regular, ongoing payments are prohibited.

See: Allowable Support Services

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 vendor cards, including bus and gas-only cards. This document may be kept in the case file or on an agency support service log.

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 $1200.00 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.

Individual 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 [Individual Employment Plan](#) (IEP.)

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.

WF1 TIP: 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 other appropriate state agency. https://www.ohe.state.mn.us/mPg.cfm?pageID=197

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).

Work Experience

A Work Experience may be paid or unpaid.

Paid Work Experience may also be known as **"Subsidized Employment"** or **"Transitional Employment:"** 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. As of July 1, 2021, a work experience activity will have a limited time frame 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.

On-the-Job Training (OJT) 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. Upon satisfactory completion of the training period, the employer is expected to retain participants as regular, permanent employees without receiving a subsidy. On-the-job training contracts may be entered into if part of the approved work plan. Time limits on OJT contracts are pre-defined in the contract. Wages are paid directly to the participant employee by the employer and are reimbursed by the grantee. Subsidy reimbursed to the employer by the grantee cannot exceed 75% of the participant's wage.

See: Definitions.