



IMPERIAL COUNTY WORKFORCE DEVELOPMENT BOARD

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POLICY	ORIGINAL DATE	LAST REVISION
WIOA Transitional Jobs Policy	FISCAL YEAR 2019-2020	January 15, 2020

POLICY OVERVIEW:

The purpose of this policy is to provide guidance and criteria to be used by the Imperial County Workforce Development Board (ICWDB), the Imperial County Workforce and Economic Development Office (ICWED), America's Job Center of California (AJCC) staff, and Workforce Innovation and Opportunity Act (WIOA) Title I funded service providers, in the provision of transitional job activities for eligible WIOA Adult and Dislocated Workers served with WIOA Title I funds.

REFERENCES:

- DOL TEGL 3-15, Guidance on Services Provider through the Adult and Dislocated Worker Program under WIOA
- WIOA Section 134(d)(5)

BACKGROUND:

A transitional job is defined as a job that provides a time-limited work experience that is wage paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history.

These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. Transitional job activities must be combined with comprehensive career and supportive services provided prior to, or concurrently with, the transitional job activity.

Transitional jobs should be designed to provide a participant with time-limited work experiences to help him/her establish a work history, achieve success in the workplace, and develop the skills needed to obtain and retain unsubsidized employment.

PARTICIPANT ELIGIBILITY REQUIREMENTS

In addition to meeting general eligibility requirements for the WIOA program and being unemployed at the date of application to the WIOA program, the participant must also have: (1) one or more barriers to employment; and (2) be chronically unemployed or have an inconsistent work history. These eligibility requirements must be documented in the participant file.

1. **Barriers to Employment** - For the purpose of participant eligibility for transitional job activities, barriers to employment include one or more of the following:
 - Low-income individuals
 - Individuals with disabilities
 - Ex-Offenders
 - Homeless individual
 - English Language Learners
 - Displaced Homemaker

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- Secondary School Dropout
 - Basic Skills Deficient
2. Chronically Unemployed or Inconsistent Work History – For the purpose of participant eligibility for transitional job activities, individuals are considered to be chronically unemployed or to have an inconsistent work history when they meet one or more of the following criteria:
- Has never held a full-time job (30+ hours per week) for more than 13 consecutive weeks
 - Has been fired from a job within the 12 months prior to application
 - Has held more than three jobs in the 52 weeks prior to application
 - Is on parole or probation, or has been released from prison/jail within the 12 months prior to application
 - Has been unemployed for the 13 consecutive weeks prior to application
 - Has been unemployed for 15 or more of the 26 weeks prior to application

In addition to including documentation of an individual's eligibility under items 1 and 2 above, eligibility documentation will be attained to indicate the individual is eligible to participate in a transitional job activity during participation in the WIOA program.

Typically, one would not assume that a dislocated worker would be eligible for transitional job activities with respect to being chronically unemployed or have an inconsistent work history. Displaced homemakers and spouses of members of the Armed Force on active duty may, however, have a need for this service. While other categories of dislocated workers may meet the eligibility requirements and receive such services, it is anticipated that most individuals who participate in transitional job activities will be enrolled in the WIOA Adult program. AJCC staff should take extra care during the assessment and IEP development process to ensure that the rationale for participating in transitional job activities as a participant of the WIOA Dislocated Worker program is clearly outlined in the IEP and case notes.

EMPLOYER REQUIREMENTS

Employers willing to work with participants in transitional job activities may be from the private for-profit sector, the private non-profit sector, or the public sector. As transitional jobs are structured to help participants achieve success in the workplace and develop the skills needed to obtain and retain unsubsidized employment, the employer must be able to provide supervision and appropriate feedback to the participant at regular intervals during the course of the activity.

Employers must also be willing to participate in the required on-site monitoring visits conducted by ICWEDO and AJCC staff to evaluate the participant's performance.

There is no expectation that the employer will retain the participant at the completion of the transitional job. However, if the employer is interested in hiring the participant after the transitional job activity has been completed, and additional training is needed, an OJT may be developed that follows the requirements of ICWDB's OJT Policy.

PROVISION OF TRANSITIONAL JOB SERVICES

Participants who are unemployed at the point of application, have a qualifying barrier to employment, and who are chronically unemployed or have an inconsistent work history may participate in transitional job activities.

All eligible participants must first undergo an appropriate assessment and develop, with the assistance of AJCC staff, an Individual Employment Plan (IEP) that includes the rationale for a transitional job.

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The transitional job must be accompanied by comprehensive career and supportive services delivered prior to, or concurrently with, the transitional job. Supportive service needs shall be determined during the assessment process, and the identified supportive service needs and how they will be delivered shall be outlined in the IEP.

The appropriate mix of career services shall also be outlined in the IEP and must include, at a minimum, at least one of the following individualized career services:

- Career Planning
- Group and/or Individual Counseling
- Short-term Prevocational Services (including soft skills training)
- Workforce Preparation Activities
- Financial Literacy Services
- Out-of-Area Job Search Assistance and Relocation Assistance
- English language acquisition and integrated education and training programs

Individualized career services may also be delivered upon completion of the transitional job activity, as long as one or more of the above are delivered prior to or during the transitional job.

Eligible participants may participate in up to 500 hours of transitional job activities, delivered over a maximum period of 26 weeks. The participant may be placed with more than one employer during the transitional job activity, but the total number of hours for all worksites may not exceed 500 hours or 26 weeks, whichever comes first.

Transitional jobs shall be developed, to the extent practicable, with an employer in an industry that is of interest to the participant. It is anticipated that most transitional jobs will be entry level positions, and the participant shall be paid minimum or prevailing wage, whichever is greater.

WORKSITE AGREEMENT

ICWED requires a written, signed agreement between qualified employers prior to the start of work. These worksite agreements will be similar to those used for internships and other work-based learning activities where the participant is being paid and the employer providing the supervision for the participant is not the employer of record.

MONITORING:

ICWED is responsible for ensuring oversight of the WIOA Title I funded programs. Monitoring shall take place by means of on-site visits to America's Job Center of California and qualified employers. Site visits shall be performed at least once each calendar month during the transitional job period. All monitoring results must be documented in the participant's file.

This on-site monitoring shall include not only an evaluation of soft skills, but an evaluation of occupational skills listed in the job description/training plan that is incorporated into the Worksite Agreement.

ACTION:

Please bring this policy to the attention of ICWED, AJCC system staff and appropriate WIOA funded service providers and sub-recipients. This policy is effective immediately. Once the exhibits pertaining to this policy are approved by the ICWDB, they will not require board approval if other changes occur, unless the change affects protocols. Should you have any questions, please feel free to contact ICWDB staff at (442) 265-4974, (442) 265-4959 or the Program and Compliance Manager (442) 265-4963.

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