

# TANF YOUTH DEVELOPMENT PROGRAM POLICY GUIDE



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## OVERVIEW

### PARTNER4WORK

Partner4Work (P4W), formerly Three Rivers Workforce Investment Board, was established by the Workforce Investment Act of 1998 (WIA) and was later reauthorized by the Workforce Innovation and Opportunity Act in 2014 (WIOA). In its 20+ years, Partner4Work has delivered innovative solutions and supported local partners to develop a thriving workforce in Allegheny County and the City of Pittsburgh. From its initial focus as a small think tank, P4W has evolved its focus to include the development of strategic and systemic workforce solutions and funding key workforce partners including PA CareerLink(R) Pittsburgh/Allegheny County. With a budget comprised of public and private workforce funds, Partner4Work delivers a comprehensive portfolio of programs and initiatives to meet the current and future needs of employers and job seekers.

#### **Our Vision**

Partner4Work envisions a thriving and prosperous community, where all residents have access to expansive career opportunities and all businesses have access to a talented workforce.

#### **Mission**

To develop a thriving workforce, Partner4Work drives and delivers strategic investments, provides expertise, and creates opportunities for businesses, job seekers, agencies, and policymakers in Allegheny County and the City of Pittsburgh.

To find out more about Partner4Work: [www.partner4work.org](http://www.partner4work.org)

### TANF BACKGROUND

The Temporary Assistance for Needy Families (TANF) block grant was created in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-193) and signed into law by then president, Bill Clinton. A product of decades-long debate over welfare reform, TANF would provide states with a broad-purpose block grant that helps fund a wide range of benefits, services, and activities to address the effects of, and root causes of, child poverty and economic disadvantage. The primary goal of Pennsylvania’s TANF Program is to provide support to families as they make the transition from dependence on welfare to self-sufficiency.

### TANF YOUTH

The Temporary Assistance for Needy Families Youth Development Program (TANF YDP), funded by The PA Department of Human Services (PA DHS) and administered by the PA Department of Labor and

Industry (L&I), is intended to enhance workforce investment funding and extend the availability of high-quality workforce development activities to low-income youth. TANF programs provide quality workforce services for youth and young adults, focusing on employment and education experiences and the development of essential workplace skills.

TANF Youth Development Programs may serve youth ages 12 through 24 but are not required to serve all ages within that range. The broad range of ages allows programming to focus on work experience opportunities and workforce exposure activities. TANF YDP providers may choose to focus the activities/services they plan to provide on older youth, younger youth, or all of the TANF youth age range, if the overall TANF YDP requirements, including allowable costs, are being followed.

Activities must provide direct services to qualified youth participants and should incorporate the 14 Youth Program Elements mandated by the Workforce Innovation and Opportunity Act (WIOA). WIOA outlines a broader youth vision that supports an integrated service delivery system and gives a framework through which states and local areas can leverage other federal, state, local, and philanthropic resources to support in-school youth (ISY) and out-of-school youth (OSY). Pennsylvania's WIOA Combined State Plan, affirms WIOA's priority of providing high-quality services for disadvantaged youth and young adults beginning with career exploration and guidance, continued support for high-quality case management toward educational attainment, opportunities for skills training in in-demand industries, and occupations. The intention of these collaborative services culminates with participants enrolling in post-secondary education, developing long-term career pathways, and obtaining a job earning a family or self-sustaining wage.

## PURPOSE OF MANUAL

This manual provides policy and procedure guidance for Partner4Work (P4W) partners and subgrantees delivering Temporary Assistance for Needy Families Youth Development Program (TANF YDP) services in Allegheny County and the City of Pittsburgh. These policies are to be used when determining eligibility and providing services funded by TANF; their implementation is the responsibility of TANF YDP program and Partner4Work staff.

## AUDIENCE/ RESPONSIBLE PARTIES

These policies apply to all Allegheny County/Pittsburgh TANF YDP [participants](#) and to individuals interested in enrolling in these programs.

Allegheny County/Pittsburgh TANF YDP staff and Partner4Work staff are responsible for implementing these policies.

## QUALIFICATION PROCESS

To be able to utilize TANF YDP funds, all TANF YDP participants must be qualified by The Department of Human Services (DHS). DHS has established a Preliminary Screening Tool in the Commonwealth Workforce Development System (CWDS) 2.0 that will be used to qualify applicants for TANF YDP services. TANF YDP providers must utilize the Preliminary Screening Tool to ensure that [personally identifiable information \(PII\)](#) is not transmitted through unsecured methods.

TANF YDP providers must ensure that the applicant meets the age eligibility requirements of the TANF YDP prior to utilizing this tool. To be eligible for TANF YDP funded services, the applicant must be between

the ages of 12 (or have completed the 5th grade) and 24 years at the time of application. If the applicant does not meet the age requirement, the applicant is ineligible for services using TANF YDP funds. The provider will not proceed with the Preliminary Screening Function but will review the applicant's eligibility for services through other funding sources.

Access the TANF YDP Preliminary Screening Instructions [here](#).

## TANF YOUTH ELIGIBILITY

This section ensures every participant who receives TANF Youth program funded services is eligible and registered to receive those services.

*Disclaimer:* This manual contains language regarding eligibility criteria as it appears in the WIOA legislation. However, Partner4Work encourages providers to utilize person-centered language, where possible. For example, "individual with a criminal background" or "individual experiencing homelessness" may be used in place of "an offender" or "homeless individual", respectively.

Youth must meet basic eligibility requirements to participate in the TANF Youth program. Both In-School Youth (ISY) and Out-of-School Youth (OSY) must meet the following requirements:

- Be between the ages of 12 (or having completed the 5th grade) and 24 years;
- Have their identity verified through SSN;
- Be a resident of Allegheny County and/or the City of Pittsburgh;
- Be a U.S. citizen or a TANF-eligible non-citizen;
- Meet [selective service](#) registration requirements (individuals assigned male at birth only, if applicable); and
- Have a personal monthly gross earned income that does not exceed [235% of the Federal Poverty Income Guidelines \(FPIG\)](#);
  - **Note:** The youth's sole monthly gross earned income shall establish their qualification unless the youth is (a) legally married or (b) has children and is residing in the same home as the child(ren)'s other parent. In those instances, the youth and their spouse or the other parent of the child(ren)'s gross earned income will apply, and the family's household size will include the youth, spouse or other parent of common child(ren) residing with them, and the child(ren). Proof of income must be dated within the last 30 days. Personal monthly gross income verification is required only at the time of enrollment.
- Individuals who have a personal monthly gross earned income that exceeds 235% of the FPIG may meet income eligibility requirements if they are a resident of a designated high poverty area and have any one or more of the documented additional barriers listed below. This method may only be used for individuals earning above 235% of the FPIG.
  - The most current version of the Pennsylvania High Poverty Area Verification tool, distributed by L&I's Bureau of Workforce Partnership and Operations (BWPO), will be used to determine if a youth resides in a high poverty area.

### ADDITIONAL ELIGIBILITY REQUIREMENTS FOR IN-SCHOOL YOUTH (ISY)

- [Basic skills deficient](#).

- English language learner.
- An [offender](#), or a child of an incarcerated parent(s).
- [Homeless](#), runaway, in foster care or aged out of the foster care system.
- Pregnant or parenting.
- An individual with a disability.
- A person who [requires additional assistance](#) to enter or complete an educational program or to secure and hold employment.
- Identified as at risk of dropping out of school.
- Are a migrant.

#### ADDITIONAL ELIGIBILITY REQUIREMENTS FOR OUT-OF-SCHOOL YOUTH (OSY)

- A school dropout.
- Within age of compulsory attendance but has [not attended](#) for at least the most recent complete school year calendar quarter.
- Holds a secondary school diploma or recognized equivalent and is [basic skills deficient](#) or an English language learner.
- Subject to the juvenile or adult justice system, or a child of an incarcerated parent(s).
- [Homeless](#), runaway, in foster care or aged out of the foster care system, eligible for assistance under Section 477, Social Security Act, or in out-of-home placement.
- Pregnant or parenting.
- An individual with a disability.
- [Requires additional assistance](#) to enter or complete an educational program or to secure and hold employment.
- Are a migrant.

#### ADDITIONAL TANF ELIGIBILITY INFORMATION:

- TANF in-school youth must be attending an accredited secondary school. TANF out-of-school youth must not be currently enrolled in secondary school.
- A person is not eligible for TANF if they are an inmate or resident of a public penal, reform, correctional or mental institution, or any other public institution or temporarily hospitalized in a public mental institution. A court-involved youth may participate in the TANF Youth programming if they reside in:
  - A maternity home; or
  - A drug and alcohol rehabilitation center; or
  - A detoxification unit; or
  - Community residential facilities under contract to, or operated by, state, county, or municipal authorities, such as Community Correction Centers (CCCs).

TANF YDF providers should refer to the Pennsylvania TANF Youth Development Program Summer and Year-Round Policy and Procedures Manual ([July 1, 2023 – June 30, 2024](#)) for additional information on how to determine TANF eligibility if institutionalized.

- For all group activities, TANF Youth providers must collect the required documentation to verify that each group activity participant is qualified to receive TANF Youth services before a given activity. For verified individuals qualified as TANF participants, participation begins on the date the youth applied and will remain qualified for 12 months. During this time, the youth may participate in multiple services with different local providers.

- **Note:** If a TANF Youth provider chooses to serve individuals before establishing them as a qualified participant, the provider accepts the responsibility for funding services to those determined to be non- TANF eligible with an alternative funding source.

Partner4Work reserves the right to set additional eligibility requirements on an individual contractual basis. Subrecipients should refer to their contract with Partner4Work for the full scope of eligibility requirements for their program.

## FEDERAL POVERTY INCOME GUIDELINES 2023

Household Size	Federal Poverty Guideline (FPIG)	235% of FPIG	235% of FPIG (Monthly)	235% of FPIG (Hourly Wage)
1	\$14,580	\$34,263	\$2,855	\$16.47
2	\$19,720	\$46,342	\$3,862	\$22.28
3	\$24,860	\$58,421	\$4,868	\$28.09
4	\$30,000	\$70,500	\$5,875	\$33.89
5	\$35,140	\$82,579	\$6,882	\$39.70
6	\$40,280	\$94,658	\$7,888	\$45.51
7	\$45,420	\$106,737	\$8,895	\$51.32
8	\$50,560	\$118,816	\$9,901	\$57.12

## SELECTIVE SERVICE

Individuals are required to register with Selective Service if they meet the following criteria:

- U.S. Citizen or Permanent Resident Non-Citizen;
- Between the ages of 18 and 26; and
- Assigned male at birth;

Qualifying individuals who failed to register with Selective Service by their 26<sup>th</sup> birthday and can provide written explanation and supporting documentation of any of the following may be eligible for WIOA services:

- Over the age of 26 and were willing but unknowing of the requirement to register with Selective Service;
- Incarceration, institutionalization, or hospitalization between the ages of 18-26; OR
- Non-citizen status and non-permanent resident status before age 26.

Partner4Work will monitor Selective Service exceptions to ensure that proper procedures are followed.

## SELF CERTIFICATION

TANF YDF participants may [self-certify](#) if they do not have earned income. The [WIOA Self-Certification or Statement of Family Size/Income Form](#) may be used for this purpose. For individuals with earned income, self-certification must only be used as a last resort for verifying income and attempts to collect verification must be documented in client case notes. Where an additional documented barrier is required for TANF YDF eligibility, self-certification may be used when other forms of verification are unavailable.

TANF YDF providers may also use telephone-verification, especially in consideration of individuals with barriers. When applicable, eligibility criteria may be verified by telephone contacts with recognized governmental or social services agencies, or by document inspections. Information obtained through this method should be documented on the attached [Telephone/Document Inspection Verification Form](#).

## PRIORITY OF SERVICES

Eligible youth with any of the following barriers to success are expected to be prioritized for services and activities:

1. School dropout or identified as at risk of dropping out of school.
2. Within the age of compulsory attendance but has [not attended](#) for at least the most recent complete school year calendar quarter.
3. [Basic skills deficient](#).
4. An English language learner.
5. Have a disability.
6. Court-involved or at risk of involvement.
7. Child(ren) of an incarcerated parent(s).
8. In foster care or aging out of foster care.
9. [Homeless](#) or a runaway.
10. Pregnant or parenting.
11. A migrant.
12. In [need of additional assistance](#) to enter or complete an educational program or to secure and hold employment.

## ONGOING ENROLLMENT

TANF YDP [participants](#) must complete a new application after 12-months of participation if the youth wish to continue their engagement in TANF YDP activities. A youth's 12-month qualification period begins on the date the initial TANF YDP application was completed and subsequently qualified.

- Example: Youth completed an application on October 8, 2022 and was found eligible through the Preliminary Screening Tool on October 10, 2022. The participant received year-round services from one local program in October 2022 and summer services in July 2023 from another local program. The participant would be required to complete a new application and be re-qualified in October of 2023.

The qualification process must be used as indicated to validate a participant on the 12-month cycle. All verifications previously collected must be maintained in the youth's data file. Information not previously collected in the youth's initial enrollment would require verification at the time of re-enrollment and stored in the data file as appropriate.

## TANF YOUTH SERVICES

As noted in the overview above, TANF YDPs must incorporate all 14 Program Elements described within the Workforce Innovation and Opportunity Act of 2014 (WIOA) to align with the TANF Statewide Plan. However, not all participants are required to receive all 14 WIOA Youth Program Elements; program elements that a participant will receive will be based on individual needs as determined by the participant



and the TANF YDP case manager. Furthermore, it is **not** expected that all providers would deliver all 14 elements, but all elements should be available to youth through a combination of referral partnerships.

WIOA PROGRAM ELEMENT	DESCRIPTION
1. Tutoring, study skills training, and instruction leading to the completion of secondary school, including dropout prevention strategies;	These services focus on academic support, assisting with learning obstacles, and can be provided one-on-one, in a group setting, or through resources and workshops.
2. Alternative secondary school services or dropout recovery, as appropriate;	“Dropout recovery” refers to services attempting to reengage students, who may have dropped out, through credit recovery, counselling, and educational plan development.
3. Paid and unpaid work experience that links academic and occupational education, employment opportunities, pre-apprenticeship programs, internships and job shadowing, and on the job training;	Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period. Work experience may be paid or unpaid, and may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards <a href="#">Act</a> or applicable <a href="#">State</a> law.
4. Occupational skills training, as appropriate; particularly training that leads to <a href="#">industry recognized credentials</a> aligned with in-demand industry sectors;	Occupational skills training is defined as an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Such training must: <ul style="list-style-type: none"> <li>(1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy;</li> <li>(2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and</li> <li>(3) Lead to the attainment of a <a href="#">recognized postsecondary credential</a>.</li> </ul>
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;	This program element reflects an integrated education and training model and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.

<p>6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors, as appropriate;</p>	<p>Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as:</p> <ul style="list-style-type: none"> <li>(a) Exposure to postsecondary educational possibilities;</li> <li>(b) Community and service learning projects;</li> <li>(c) Peer-centered activities, including peer mentoring and tutoring;</li> <li>(d) Organizational and team work training, including team leadership training;</li> <li>(e) Training in decision-making, including determining priorities and problem solving;</li> <li>(f) Citizenship training, including life skills training such as parenting and work behavior training;</li> <li>(g) Civic engagement activities which promote the quality of life in a community; and</li> <li>(h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.</li> </ul>
<p>7. Supportive services</p>	<p>Supportive services can be essential to the success of youth enrolled in workforce investment programming. TANF YDP providers are strongly encouraged to make supportive services available when they are necessary to enable an individual to participate in authorized TANF YDP activities; these services include transportation, childcare, housing, health/mental health care, educational testing, and work-related tools (e.g., eyewear, program uniform, etc.).</p>
<p>8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;</p>	<p>(a) Adult mentoring for youth must:</p> <ul style="list-style-type: none"> <li>(1) Last at least 12 months and may take place both during the program and following exit from the program;</li> <li>(2) Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and</li> <li>(3) While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.</li> </ul>

	(b) Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.
9. Follow-up services	<p>WIOA describes “follow-up services” as critical services provided for at least 12 months following a youth’s exit from the program to help ensure that youth is successful in employment and/or postsecondary education and training; follow-up services may include regular contact with a youth participant’s employer, including assistance in addressing work-related problems that arise.</p> <p><b>NOTE: While encouraged, TANF Youth Development Funds do not provide for follow-up services; TANF YDP services end upon the completion of the 12-month cycle unless the participant re-enrolls or has additional funding available.</b></p> <p><b>WIOA funding will cover follow-up services for co-enrolled individuals after program exit.</b></p>
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;	<p>“Comprehensive guidance and counseling” provides individualized counseling to participants. In addition to drug and alcohol, this may include counseling for mental health, or a coordinated referral to an appropriate partner. If referred, coordination between provider and agency is necessary for continuity of service.</p>
11. Financial literacy education;	<p>Activities included in this program element may support in the ability to create budgets, initiate checking and savings accounts at banks, manage spending, and teach participants about the significance of credit scores.</p>
12. Entrepreneurial skills training;	<p>Entrepreneurial skills training provides the basics of starting and operating a small business. Skills associated with entrepreneurship may include: 1) Taking initiative 2) Creatively seeking out and identifying business opportunities and 3) Developing budgets.</p>
13. Services that provide labor market information, such as career awareness, counseling, and exploration;	<p>“Labor market information” includes the identification and/or analysis of topics such as employment, unemployment, local employment dynamics, and occupational projections.</p>
14. Activities that help youth prepare for and transition to post-secondary education and training.	<p>“Preparing for post-secondary education and training” may include SAT/ACT test preparation, exploring education options including technical training schools and community colleges, or providing support with financial aid applications.</p>

## SUPPORTIVE SERVICES

Supportive services can be essential to the success of youth enrolled in workforce investment programming, therefore TANF Youth providers are strongly encouraged to make supportive services available when they are necessary to enable an individual to participate in authorized activities.

Additionally, partnerships must be cultivated with private and public-sector agencies to leverage and increase the resources available to meet the needs of youth. TANF participant referrals may then be made to partners who can provide other needed services for the overall support and success of a youth or young adult. Partners can include programs or agencies such as those funded by the U.S. Departments of Labor, Health and Human Services, Housing and Urban Development, and Justice, as well as faith and community-based organizations.

## YOUTH PAYMENTS

TANF allows for several forms of payments to be made available to program participants in the form of incentives, stipends, and wages. The following section articulates the distinction between these payments, and how incentives and stipends are permitted to be provided to participants enrolled in Partner4Work funded youth programs.

<b>INCENTIVES</b>	<b>STIPENDS</b>	<b>WAGES</b>
Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education).	Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends are based on levels of program participation or attendance met. Stipends are not considered income for WIOA eligibility purposes, are not required to meet minimum wage requirements, are not dispersed as payroll, and income tax is not withheld.	A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.

## GENERAL REQUIREMENTS

Incentives and stipends must be provided in accordance with all federal, state, and local policies and requirements applicable to the program and/or funding stream. Each Partner4Work funded program that utilizes these must maintain a written policy that outlines a uniform and consistent strategy for issuing payments to program participants. Providers must submit this policy to Partner4Work for approval prior to issuing incentives or stipends for a program. Incentives and stipends must also be approved and budgeted for during the contracting process.

## INCENTIVE REQUIREMENTS

Programs interested in providing incentives must receive approval from Partner4Work. Incentives must be permitted under all federal, state, and local policies and requirements applicable to the program and/or funding stream. Partner4Work will also consider other factors, including but not limited to funding availability and how incentives align with and support the achievement of program goals.

The following are the eligibility requirements for providing incentive payments:

- Participants must be active and in good standing with a program.
- Participants must be enrolled in an approved training program or be actively participating in work experience.
- Participants must have achieved an outcome listed as a goal within their individual service strategy (ISS).

At a minimum, the provider's incentive policy must include:

- The method, justification, and amounts for the issuance of incentives;
- The method by which gift cards for incentives are purchased (e.g. with a purchasing card), if applicable;
- The method by which gift cards for incentives are stored, if applicable; and
- The internal controls for incentive awards, including the staff responsible for approving an incentive.

Programs may not award direct cash payments to participants as part of an incentive strategy. The maximum amount permitted per incentive issued to a participant is \$100. Incentives must be administered in a manner that ensures all participants receive equal awards for equal achievements. Participants cannot receive multiple incentives for the same program achievement. Incentives must not include entertainment costs, such as movie or event tickets or gift cards to movie theatres.

Incentive payments may only be awarded in recognition of an achievement directly tied to training or work experience and must align with the goals of the program and participant goals in the ISS. Examples include obtaining a GED, placement in employment, and retention of a job for 90 days. Funds may not be used for incentive payments issued as motivation for activities such as recruitment, submission of documentation, or completion/review of an ISS or IEP.

At least three individuals must sign off to indicate that an incentive has been awarded: two staff members of the service provider, who are familiar with incentive policy requirements, and the participant receiving the incentive.

The provider's written incentive policy must clearly describe this process. Providers may not have more gift cards on hand than enrolled participants at any given time (i.e. if a program has 25 enrolled participants, no more than 25 gift cards can be on hand at once. If a program has 100 enrolled participants, no more than 100 gift cards can be on hand at a time). Partner4Work encourages providers to limit the number of gift cards stored on site when possible. Providers should maintain a consistent method for purchasing gift cards where possible (e.g. purchasing card or company credit card).

Organizations providing incentives to participants should be aware of any implications under IRS provisions. Please consult [www.irs.gov](http://www.irs.gov) for more information. It is the responsibility of the service provider to maintain required documentation detailing the distribution and management of incentives.

## STIPEND REQUIREMENTS

The following are the eligibility requirements for stipends:

- Participants must be active and in good standing with a program.
- Participants must be enrolled in a training program or be actively participating in work experience.
- Participants must meet the participation or attendance requirements established in the provider's written policy for issuing stipends.

At a minimum, the provider's stipend policy must include:

- The justification for providing stipends and the specific attendance/participation levels that must be met for the issuance of stipends;
- The amount and method of payment for the issuance of stipends; and
- The internal controls for stipend payments, including but not limited to how participation/attendance will be documented and verified, and the staff responsible for approving the issuance of a stipend.

Stipend payments must only be issued for participation/attendance in training when there is a defined curriculum and criteria for completing the curriculum. Stipends may be issued for work experience, but must not replace wages when a wage is required to be paid. Stipends must only be issued for activities aligned with the goals of the program and participant goals outlined in the individual service strategy (ISS). Stipends must be administered in a manner that ensures all participants receive equal payments for equal levels of participation/attendance. Stipends must be based on levels of program participation or attendance, as defined in the provider's stipend policy . Unlike a wage, stipends should **not** be based on an hourly rate. Providers are responsible for documenting participation/attendance in the activity as the basis of stipend payments.

At least three individuals must sign off to indicate that a stipend has been awarded: two staff members of the service provider, who are familiar with stipend policy requirements, and the participant receiving the stipend. The provider's written stipend policy must clearly describe this process. It is the responsibility of the service provider to maintain all records of participation/attendance (e.g. timesheets or attendance sheets) and the issuing of stipends (e.g. signed stipend approval forms). This information should be documented in the participant's case file.

Organizations providing wages or stipends to participants should be aware of any implications under IRS provisions. Please consult [www.irs.gov](http://www.irs.gov) for more information.

## YOUTH WORK EXPERIENCE

Steadfast in the belief that youth learn to work by working, Partner4Work requires youth providers to use TANF funds to assist youth in obtaining paid and unpaid [work experience](#) while enrolled in programs. This section sets requirements for employer participation in paid and unpaid work experience.

### ELIGIBILITY

#### **Participant Eligibility**

All youth participants enrolled in TANF services are eligible for participation in work experience activities, provided the activities are deemed in line with the individual's career plan and service strategy.

#### **General Work Experience Employer Eligibility**

Potentially eligible companies able to participate in youth work experience include: for profit businesses, non-profit organizations, and public sector employers. Partner4Work youth providers are responsible for ensuring that the on-site supervisors of all youth participants placed in paid or unpaid work experience have all applicable child abuse and criminal background check clearances.

### **Paid Work Experience Employer Eligibility**

The provider organization with which the youth is enrolled serves as the employer of record and is responsible for ensuring that wages are paid on time and in full. Non-profit, for-profit, and public entities are eligible to serve as paid work experience sites. A company will not be eligible to host a youth participant for work experience if:

- 1) The company has any other individual on layoff from the same or substantially equivalent positions.
- 2) The youth paid work experience would infringe upon the promotion or displacement of any currently employed worker or cause a reduction in their hours.
- 3) The same or a substantially equivalent position is open due to a hiring freeze.
- 4) The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.

### **PROCEDURES**

Partner4Work encourages providers to enroll youth in paid work experience where possible. Youth participants in work experience must have an up-to-date Individual Service Strategy reflecting the need for work experience.

### **Employer Requirements**

With assistance from youth contractor staff, participating employers must guarantee that:

- 1) The training to be provided will be in accordance with the Workforce Innovation and Opportunity Act (WIOA) 181(a)(1)(A), and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
- 2) All applicable child labor laws are followed.
- 3) The employer agrees to cooperate with monitoring efforts as required by WIOA legislation and adhere to all other applicable local, state and federal rules and regulations.
- 4) Ensure funds are not used to directly or indirectly assist, promote, or deter union organizing.
- 5) Employers must agree to respond to workforce development system staff requests for wage and retention information of participants.
- 6) Employers are expected to provide a job description before the start of the work experience and complete an exit survey upon completion of the work experience.

### **General Requirements**

- 1) Per WIOA regulations (20 CFR 683.200(g)), “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For the purpose of this policy, the term “immediate family” includes a spouse, child, son-in-law, daughter in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.

- 2) Provider costs of administering paid and unpaid work experience programs are allowable costs under this policy.

## POLICY EXCEPTIONS

Under limited circumstances, Partner4Work may grant exceptions to requirements within a local policy. Exception requests will be reviewed based on their allowability under WIOA and any other applicable legislation, regulation, and policy/guidance. Partner4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

Individuals or entities seeking to request an exception must complete the [Policy Exception Form](#) which is attached to this manual. Exception requests are to be sent to [policy@partner4work.org](mailto:policy@partner4work.org)

## PERFORMANCE MEASURES

TANF funds are broadly intended to be used to expand the availability of the 14 WIOA elements and provide workforce development activities for eligible young people. There are no specific performance measures required by the funding stream, however, all TANF-funded programs will be required by Partner4Work to have measurable outcomes specific to their program design that will include as a baseline that all youth participate in a work-based learning opportunity and at least 85% complete the experience.

Ultimately, the value in career exploration is that young people learn about their strengths and competencies, build the skills necessary to be successful in a future workplace, and they're exposed to a variety of possibilities for career pathways. This is best done experientially in the context of an actual workplace. Below are the baseline required performance measures for a career exploration and experience program. Providers are expected to set at least two additional performance measures that speak to the goals of the program and demonstrate progress made by young people. Additional goals should be specific, measurable, attainable within a program year, reasonable and timely. Partner4Work reserves the right to add or modify performance measures in each year's contract negotiation.

CRITERION	PERFORMANCE STANDARD
<b>Program Retention</b> The percentage of participants who start and complete the program.	90%
<b>Development of Career Plan or Individualized Service Strategy (ISS)</b> Percent of young people who develop a career plan known as an individual service strategy	100%
<b>Participation in Work-Based Learning Experience</b> Percent of participants who <b>PARTICIPATE</b> in paid or unpaid work experience, job shadow, internship, externship, cooperative education, career mentoring, pre apprenticeships, paid or unpaid work experience by the end of the program year. Participation in Learn and Earn is considered a work-based learning experience.	100%
<b>Percent of young people who successfully complete a work-based learning experience</b>	85%



The percentage of participants who <b>COMPLETE</b> the work-based learning experience described above.	
<b>Exposure to Priority Industries:</b> Percent of experiences that align with one of the following industries: healthcare, technology, financial services, construction, or manufacturing	Baseline
<b>Employment or Education Placement</b> The percentage of High School graduates or those with a GED equivalent who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational training by the end of the program year.	80%
<b>Employer Engagement</b> The percentage of employer partners that engage directly with youth through providing opportunities for work-based learning or career exploration.	Baseline

## PERSONALLY IDENTIFIABLE INFORMATION

As part of grant activities, staff may have access to program participant or staff PII. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, or other sources. Federal law and federal policies require that PII and other sensitive information be secured and protected at all times.

### KEY TERMS

**PERSONALLY IDENTIFIABLE INFORMATION:** The Office of Management and Budget (OMB) defines “Personally Identifiable Information” (PII) as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

The Department of Labor has defined two types of PII, “protected PII” and “non-sensitive PII.” The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result from the release of the PII.

- 1) **“Protected PII”** is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information, and computer passwords.
- 2) **“Non-sensitive PII”** is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is standalone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a social security number, a date of birth, and mother's maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

## REQUIREMENTS

All parties must ensure the privacy of all [PII](#) obtained from [participants](#) and to protect such information from unauthorized disclosure. All parties must ensure that PII used during their grant has been obtained in conformity with applicable Federal and state laws and policies governing the confidentiality of information.

All PII transmitted via e-mail or stored on external drives must be encrypted. All PII stored onsite must be kept safe from unauthorized individuals at all times and must be managed with appropriate information technology (IT) services. Accessing, processing, and storing of PII data on personally owned equipment at off-site locations (e.g. employee's home, and non-grantee managed IT services, e.g. Yahoo mail, Gmail, etc.) is strictly prohibited.

All parties who will have access to [sensitive](#)/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards with which they must comply to protect the information, and that they may be liable to civil and criminal sanctions for improper disclosure.

Access to any PII obtained through the grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means.

Grantees must permit the [Employment and Training Administration \(ETA\)](#) and Partner4Work to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure that the grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, grantees must make records applicable to this agreement available to authorized persons for the purpose of inspection, review and/or audit.

Grantees must retain data received from ETA or Partner4Work only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal and Partner4Work records retention requirements, if any. Thereafter, the grantee agrees that all data will be destroyed, including deletion of electronic data.

### **Additional Requirements:**

1. Before collecting [PII](#) or [sensitive information](#) from [participants](#), have participants sign releases acknowledging the use of PII for grant purposes only.
2. Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier

would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.

3. Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding) and securely deleting sensitive electronic PII.
4. Do not leave records containing PII open and unattended.
5. Store documents containing PII in locked cabinets when not in use.
6. Immediately report any breach or suspected breach of PII.

## COMPLAINT & GRIEVANCE POLICY

The purpose of this section is to inform Workforce Innovation and Opportunity Act (WIOA) program participants, staff, and other parties of the procedures for filing a complaint or grievance alleging violations of the WIOA Title I Program and/or other WIOA-related policies and regulations. Complaints or grievances related to the services and activities of the WIOA one-stop operator must adhere to these requirements as well.

### BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) mandates the development of procedures for filing complaints and grievances submitted by participants and other interested persons affected by, and who allege, violations of the requirements of WIOA Title I and WIOA-related regulations or policies. The Partner4Work WIOA Complaint and Grievance Policy applies to WIOA Title I Adult, Dislocated Worker, and Youth program complaints and complaints regarding WIOA one-stop operator services/activities only. For example, WIOA-enrolled participants may file specific complaints pertaining to a particular service providers' service, activities, case management efforts and ability to provide appropriate WIOA services.

Partner4Work is the appropriate organization of contact when the complaint specifically concerns WIOA Title I Adult, Dislocated Worker, and Youth programs or complaints regarding the WIOA one-stop operator. Each WIOA Title I Adult, Dislocated Worker, and Youth funded service provider and the one-stop operator must adhere to this policy. Service providers and the one-stop operator must retain documentation on any customer complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

### PROCEDURE

WIOA Title I Adult, Dislocated Worker, and Youth participants, staff, and/or other parties are encouraged to first seek an informal resolution at the service provider level regarding a complaint or grievance prior to filing a complaint with Partner4Work. Participants, staff, and/or other parties interested in filing a complaint with Partner4Work must follow the procedures below.

#### **Step 1: Opportunity to File a Complaint**

Individuals or entities seeking to file a written complaint to Partner4Work must complete the [Partner4Work Complaint and Grievance Form](#), which is attached to this policy and available at [partner4work.org](http://partner4work.org). This form must be mailed or emailed to the following:

Partner4Work Compliance Manager

650 Smithfield St  
Centre City Tower, Suite 2400  
Pittsburgh, PA 15222  
[grievances@partner4work.org](mailto:grievances@partner4work.org)

All complaints or grievances must be filed within **180 calendar days** of the alleged violation to be reviewed and considered by Partner4Work.

### **Step 2: Opportunity for an Informal Resolution**

The Partner4Work Compliance Manager will notify the complainant, acknowledging receipt of the complaint, within 5 calendar days of receiving the complaint.

The Partner4Work Compliance Manager will schedule a meeting with the complainant to occur within **15 calendar days** of receiving the complaint to attempt to reach an informal resolution between the parties. If an informal resolution can be reached, Partner4Work will request a written confirmation from the complainant verifying that they agree to the terms of the resolution. Partner4Work will notify all parties involved in writing that an informal resolution has been reached.

### **Step 3: Opportunity for a Hearing**

If Partner4Work is unable to reach an informal resolution with the complainant, the complainant will be provided the opportunity for a hearing to take place no later than **45 calendar days** after the initial filing date of the complaint.

To ensure bias does not influence the outcome of a hearing, Partner4Work will perform an assessment of qualified staff. Upon conclusion, Partner4Work will appoint an impartial and qualified individual as the Hearing Officer to act as a mediator and attempt to resolve the issue(s) and render an independent decision. The Hearing Officer will send out a written notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard.

All parties have the right to be accompanied by an attorney (at their own expense), or other duly authorized representative. All parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued by the Hearing Officer to the complainant and all parties who attended the hearing within **60 calendar days** of the filing of the complaint. The decision will include: 1) a synopsis of the facts, 2) a statement of reasons for the decision, and 3) notification of records. All correspondence will be mailed certified with a return receipt requested.

### **Step 4: Commonwealth Grievance and Hearing Procedures**

If Partner4Work does not provide a written decision within **60 calendar days** of receiving the complaint or either party involved receives a decision determined to be unsatisfactory, either party involved has the right to submit a local level appeal to the Commonwealth of Pennsylvania regarding the complaint in compliance with the Commonwealth of Pennsylvania's established procedures.

### **Information Requirements**

WIOA Title I Adult, Dislocated Worker, and Youth providers and the one-stop operator must make commercially reasonable efforts to ensure participants, staff, WIOA one-stop partners, and other parties

affected by the local workforce development system are informed of the content and requirements of this policy. This includes providing information on this policy during program enrollment and displaying the information in this policy at the PA CareerLink® center(s).

### **Labor Standards Violations**

If a collective bargaining agreement covering the parties to the grievance so provides, an individual alleging a labor standards violation may resolve the grievance through binding arbitration.

### **Important Disclaimers:**

- This policy does not address the procedures for processing complaints alleging discrimination under WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations, (29 CFR Part 38).
- This policy does not address the procedures for processing complaints for WIOA mandated partner programs outside of WIOA Title I Adult, Dislocated Worker, and Youth programs and the WIOA one-stop operator. Such complaints should be made via the internal processes of those partner organizations/agencies.
- Nothing in this policy precludes a complainant from pursuing a remedy authorized under another federal, state, or local law.

## **GLOSSARY OF TERMS**

Hyperlinked words throughout this manual will bring the reader to the definition below, when engaged. To navigate back to the original section, simply engage **Alt+ Left Arrow**.

**BARRIERS TO EMPLOYMENT:** Conditions that may make securing employment, completing credential/training programs or other job training/post-secondary programs difficult for certain individuals

**BASIC SKILLS DEFICIENT:** Refers to when an individual’s English reading, writing, or computing skills are at or below the 8th grade level on a generally accepted standardized test; or a youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

**HOMELESS INDIVIDUAL:** “Homeless Individual” means an individual who currently meets any of the following criteria:

- Lacks a fixed regular, and adequate nighttime residence; this includes a participant who:
  - Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
  - Is living in a motel, hotel, trailer park, or campground due to a lack of alternative adequate accommodations;
  - Is living in an emergency or transitional shelter;
  - Is abandoned in a hospital; or
  - Is awaiting foster care placement;

- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;
- Is a migratory child who, in the preceding 36 months, was required to move from one school district to another due to changes in the parent's or parent's spouse's seasonal employment in agriculture, dairy, or fishing work; or
- Is under 18 years of age and absents themselves from home or place of legal residence without the permission of his or her family (i.e. runaway youth)

(Note- A participant imprisoned or detained under an Act of Congress or State law does not meet the definition. Additionally, a participant who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.)

**INDUSTRY-RECOGNIZED CREDENTIAL:** Credentials “industry-recognized,” are defined by the U.S. Department of Labor as “either developed and offered by, or endorsed by a nationally recognized industry association or organization representing a sizable portion of the industry sector, or a credential that is sought or accepted by companies within the industry sector for purposes of hiring or recruitment which may include credentials from vendors of certain products.” Utilize the [Postsecondary Credential Attainment Decision Tree](#) to assist in making determinations about whether individual credentials count toward WIOA performance indicator.

**LOW INCOME INDIVIDUAL:** The term “low-income individual” means an individual who meets one or more of the characteristics listed below:

- Recipient of Cash Public Assistance
- Family Income that does not exceed the higher of 70% of the Lower Living Standard Income Level (LLSIL) or the poverty line
- Receives, or was determined eligible to receive, Food Stamps in the last six months
- [Homeless](#)
- Publicly supported Foster Child
- Individual with a disability and own income is at or below 70% of the LLSIL or the poverty line
- Receives, or is eligible to receive, a free or reduced-price school lunch \*
- An individual who resides in a high poverty area, defined as an area that has a poverty rate of at least 25% (set every 5 years, using American Community Survey (ACS) 5-year estimates)

\* Programs must base low-income status on an individual student's eligibility to receive free or reduced-price lunch, whole school receipt of free or reduced-price lunch cannot be used to determine WIOA low-income status for ISY. In schools where the whole school automatically receives free or reduced-price lunch, programs can check with their local school districts for determining whether individual students are eligible.

**NOT ATTENDING ANY SCHOOL:** “Not attending any school” means a youth not receiving services from a public school, charter school, cyber charter school, career and technical school, sectarian school, or private school. Individuals who are enrolled in adult basic education/GED preparation, skills training, or other remedial education programs, including YouthBuild and Job Corps are not attending any school for the purposes of this policy.

**OFFENDER:** “Offender” means an adult or juvenile who:

- 1) Is or has been subject to any stage of the criminal justice process, and who may benefit from WIOA services; or
- 2) Requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

**PARTICIPANT:** An individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy.

**PERSONALLY IDENTIFIABLE INFORMATION:** Office of Management and Budget (OMB) defines “Personally Identifiable Information” (PII) as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

The Department of Labor has defined two types of PII, “protected PII” and “non-sensitive PII.” The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result from the release of the PII.

**REQUIRES ADDITIONAL ASSISTANCE:** “An individual who requires additional assistance to complete an educational program or to secure or hold employment” is defined by Partner4Work as a youth who meets one or more of the criteria below:

- Educational Needs:
  - Has an Individualized Education Program (IEP);
  - Currently one or more grade levels behind their peer group; or
  - Has earned some post-secondary education credits, but did not complete a post-secondary program and is not currently enrolled in post-secondary education.
- Employment Needs:
  - Has never been employed;
  - Has been actively seeking employment for at least two months and remains unemployed or underemployed;
  - Has been fired from at least one job within the previous 12 months; or
  - Has had three or more jobs within the previous 12 months.
- Living Arrangements
  - Lives in a home in which only one or neither of their natural parents are present, due to incarceration, institutionalization, death, or other factors;
  - Currently resides in a government subsidized shelter or institution like a group home, rehabilitation facility or shelter for victims of domestic violence; or
  - Is an emancipated youth.
- Historically Disenfranchised and Marginalized
  - Is an individual who has experienced discrimination based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, or genetic information (including family medical history);
  - Is a migrant Youth or an individual determined eligible for Deferred Action for Childhood Arrivals (DACA) Program; or

- Labor market information indicates there is an underrepresentation of the participant’s race, national origin, gender identity, or sexual orientation within their industry of choice in Allegheny County or the Pittsburgh Metropolitan Statistical Area (MSA).
- Additional Barriers to Education or Employment
  - Has a lack of or limited access to a personal vehicle and/or lives more than 1 mile from the closest or public transportation stop to attend education/training or employment;
  - Is currently receiving services, other than (or in addition to) income-based services, from a PA Department of Human Services (PA DHS) or Allegheny County Department of Human Services (ACDHS) program; **or**
  - Has been referred to, or is being treated by, an agency for a substance abuse related issue.

**SELF-CERTIFICATION:** “Self-certification” is the individual’s signed attestation that the information said individual submitted to demonstrate eligibility for a program under title I of WIOA is true and accurate. A signed [Self-Certification Form](#) is a type of self-certification.

**SELF-EFFICACY:** An individual’s belief in his or her innate ability to achieve goals. Individuals who have high self-efficacy will exert sufficient effort that, if well executed, leads to successful outcomes, whereas those with low self-efficacy are likely to cease effort early and fail.

**SUPPORTIVE SERVICES:** Services rendered to participants to assist in overcoming barriers to secure credentials, employment or placement into a post-secondary or training program

**WAGES:** A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.

**WORK EXPERIENCE:** The term “Work Experience” means paid or unpaid employment and training provided by an employer or provider to a participant while engaged in productive work in a job that:

- 1) Is limited in duration.
- 2) Provides knowledge or skills essential to the full and adequate performance of the occupation.
- 3) Must include academic education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation.

In addition to the preceding list, “Paid Work Experience” must also adhere to Commonwealth of Pennsylvania minimum wage laws, and:

- 1) Provide reimbursement to the employer for a portion of the wage paid to the participant during the paid work experience period; or
- 2) Provide a portion or all of the wage paid directly to the participant through the Partner4Work contractor through which the youth is receiving services.

## REFERENCES

- [TANF YDP DESK GUIDE PY 2023 – 2024](#) (July 1, 2023 – June 30, 2024)
- US Department of Health and Human Services - [Federal Poverty Guidelines](#)
- TANF YDP [Frequently Asked Questions](#)



- TANF YDP [Screening Tool Q&A](#)
- [TANF State Plan 2021](#)

## FORMS



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