



EMPLOY MILWAUKEE ADMINISTRATIVE MEMO 21-03

EFFECTIVE DATE: 10/1/21
TO: Employ Milwaukee Staff and Service Provider Staff
FROM: Chytania Brown, President & CEO
RE: Federal American Rescue Plan Act (ARPA) Time Limited Policies

This memo only includes policy additions and exceptions for ARPA Workforce Development programs that differ from current Employ Milwaukee Inc. (EMI) policies and does not replace any other documents that EMI has related to work-based initiatives. This administrative memo is time limited and will expire when Federal ARPA funding expires.

A. Individual Development Plans (IDP's)

Background: For Adult and Dislocated Workers, EMI follows WIOA Title 1-A & 1-B Policy & Procedure Manual Chapter 8, Adult and Dislocated Worker Programs, 8.3 Order of Services, 8.3.1 Order of Services (<https://dwd.wisconsin.gov/wioa/policy/08/08.3.1.htm>) which describes the development of a participant Individual Employment Plan (IEP). For Youth, EMI follows WIOA Title 1-A & 1-B, Policy & Procedure Manual Chapter 10, 10.2 Youth Program Design, 10.2.4 Individual Service Strategy (<https://dwd.wisconsin.gov/wioa/policy/10/10.2.4.htm>) which describes the development of a participant Individual Service Strategy (ISS).

ARPA Workforce Development programs require an Individual Development Plan (IDP) in place of an IEP or ISS and lists activities to help participants meet their personal and employment goals. Using the IDP form, an EMI Workforce Specialist and the participant document activities and goals which move the participant from unemployment to re-employment in a self-sustaining career. IDP's must:

- Be based on the results of an assessment. The assessment can be a review of a participant resume, skills and work history conducted by the Workforce Specialist, or using the Participant Assessment in the IDP.
- Be jointly developed (signed and dated) by the Workforce Specialist and the participant;
- Include the participant's employment goals and appropriate achievement objectives. Include appropriate combination of services (as needed) to achieve employment goals;
- Documents need and eligibility for supportive services when appropriate, and any related referral information;
- Outline training eligibility criteria for those wanting to pursue training services; or occupational training such as digital literacy or job readiness training;
- Note if participant is OJT appropriate or work experience appropriate;
- Be regularly updated.

Policy on Updating IDP's: IDP's must be updated as goals expire and new goals need to be set, and as services change and participant's move through the program. At the end of this period, the Workforce Specialist and participant must determine if any other needs or goals have changed.

If the participant's **career or training goals have changed** (occupational interests, eligibility for training services, training preparation and career path information), the IDP Review page must be updated, summarizing the changes necessary, and be signed and dated by both the participant and the Workforce Specialist.

If the participant's **career or training goals have not changed**, the IDP Review page must indicate no changes at this time and be signed and dated by both the participant and the Workforce Specialist.

B. Supportive Services

Background: EMI's current Adult and Dislocated Worker Supportive Services policy is WIOA Policy 17-02, Change 2 (effective 8/26/21), and Youth Supportive Services is EMI Policy 20-01 (effective 7/1/20). The exceptions from the current Supportive Service policy for those enrolled in ARPA Workforce Development programs are as follows:

EMI Policy: An individual must receive an assessment (Comprehensive Assessment tool in ASSET Manage Assessments) that evaluates barriers to success in the WIOA program and potential resources and support systems available to the participant for barrier alleviation. This assessment is used in the development of an Individual Employment Plan (IEP).

ARPA Workforce Development program policy: All participants must receive an ARPA Workforce Development Programs "Employment Status Self-Attestation & Supportive Services Acknowledgement Form" upon enrollment which informs them of the services available through ARPA programs. Participants must also have the opportunity to discuss it with EMI staff and are required to sign the form, acknowledging that they received it. EMI's Workforce Specialist conducts an assessment which is used in the development of an Individual Development Plan (IDP) which identifies the need for supportive services.

Allowable Supportive-Services Categories

- **Employment or Training-Related Items.** In addition to the Employment or Training-Related Items listed in EMI Supportive Services policy, the ARPA Workforce Development program includes:
 - Fees for pre-employment or pre-training drug testing, background checks and medical exams;
 - Job Readiness Training, or other job coaching fees when other funding sources have been exhausted.
- **Transportation.** EMI policy includes transportation assistance to include parking reimbursements, mileage reimbursements, or public transportation assistance for costs associated with employment, training or allowable WIOA activities. Mileage is reimbursed for round trips greater than 25 miles and is reimbursed at half the IRS standard mileage rate for business. ARPA Workforce Development program reimburses:
 - For round trips greater than 20 miles and is reimbursed at the full IRS standard mileage rate for business.
- **Childcare Assistance.** EMI policy child or dependent care reimbursement is at a rate considered usual, reasonable, and customary within WDA 2, which shall be the Wisconsin Department of Children and Families Child Care Subsidy Maximum Rates. ARPA Workforce Development program reimburses for childcare assistance:
 - When the participant is participating in the employment, training, or allowable ARPA Workforce Development program activity, plus one hour per day to and from work/training;
 - Reimbursement rates for childcare are as follows: 1 child = \$4/hr.; 2 children = \$5.50/hr.; 3 or more children = \$6/hr.
- **Housing.** EMI policy states a participant may request a one-time emergency assistance with housing. ARPA Workforce Development program includes a lifetime grant limit for housing assistance of \$1,500. Housing assistance will be provided by connecting participants with the Housing Authority in Milwaukee County or the city in which they live, who will work with a network of landlords to find rentals that are affordable for each ARPA Workforce Development program participant who is in need. In addition, funds can be used to cover the large expense of security deposits and the first month's rent, which is a financial challenge that many ARPA Workforce Development program participants may not be able to overcome. Documentation of security deposits and first month rent payments from the landlord must be in the participant's file.

Payments/Reimbursements

- Expenses incurred without prior approval will not be reimbursed.
- Reimbursement will be made only after receiving itemized receipts that clearly show payment or purchase.
- Mileage reimbursement and child and dependent care costs will be paid monthly after receiving attendance report forms. Attendance forms should be turned in monthly and must be turned in during the current fiscal year. Attendance forms turned in after the end of a fiscal year will not be reimbursed.
- Supportive service payments and/or reimbursements may be made through check and are not considered a part of payroll. Service providers and participants must retain all related documentation and receipts for monitoring and eligibility purposes.

Limitations. EMI policy states supportive services for transportation and childcare are limited to \$1,000 per participant, per program year, per funding source, per category. ARPA Workforce Development program does not have a limitation on these supportive services. However, EMI's Workforce Specialist will work toward the goal of staying within DWD's recommended \$10,000 cost per participant. This \$10,000 includes funding provided for both training (paid work experience and OJT's) and supportive services. Participants whose costs may exceed the \$10,000 guideline may be considered on a case-by-case basis and with the approval of EMI's President & CEO.

C. Incentive and Stipend Payments

Background: EMI currently does not have an Incentive and Stipend Payment policy for WIOA Adult and Dislocated Workers. EMI's Youth Incentive Policy is WIOA Policy 17-03, Change 1 (effective 12/1/20). EMI's Youth incentive award payments are limited to a maximum amount of \$500 per eligible youth, per program year and are processed through a Youth Incentive Form. EMI does not have a Stipend Payment policy for Adult, Dislocated or Youth.

Policy: ARPA Workforce Development programs shall offer reasonable **incentives** to participants in recognition for achievement in their ARPA program training **activities and work experiences**. ARPA Workforce Development programs shall offer reasonable **stipends** to participants while enrolled in approved **occupational training**, when the provision of a stipend is included in the participant's IDP. Incentive and Stipend award payments shall be made in a uniform and consistent manner that ensures all participants receive equal incentives/stipends for equal achievement and/or participation.

For the purposes of this policy, the term "**incentive award payment**" shall mean a reward intended to recognize the achievement of a training activity or work experience, which can help motivate a participant to achieve a training activity or work experience goal. The term "**stipend award payment**" shall mean a payment during the hours attending occupational training, which can help improve a participant's ability to complete training. All incentive and stipend award payments are subject to the availability of ARPA Workforce Development program funds and are not an entitlement. EMI may suspend or withdraw authorization for incentive and stipend award payments at any time and at its sole discretion. The Workforce Specialist is encouraged to consult with public assistance case managers where applicable to ensure that the receipt of incentives or stipends does not negatively impact the participant's receipt of public assistance.

Incentive payments may be awarded as a cash equivalent, e.g., gift cards (not related to entertainment; e-cards are not permitted). Stipends may be awarded as a check. Federal and State taxes may be withheld if a participant indicates withholdings on W-4's, and Social Security or Medicare taxes are withheld.

Goals and/or outcomes eligible for an incentive must be linked to an achievement related to a training activity, work experience, and/or employment, as stated in the participant's IDP and documented in

accordance with applicable regulations. Participants cannot receive multiple incentive payments for the same activity unless specified below. Achievements eligible for incentive awards include:

Incentive Types of Milestones	Award Amount	Maximum Number	Example Documentation
Complete Job Readiness Training (JRT) if prescribed	\$50.00	1	Copy of JRT training completion certificate
Complete skills training activity with satisfactory attendance and certificate of completion or credential	\$200.00	1	Copy of training completion or credential.
Complete a pre-determined number of consecutive weeks of work with satisfactory attendance (e.g., no excused absences, achieved timely arrivals)	\$200.00	1	Copy of timesheet(s) or written documentation from employer
Receive satisfactory ratings from employer for a predetermined period of consecutive weeks	\$200.00	1	Copy of timesheet(s) and written documentation of satisfactory ratings from employer

Limits: Incentive payments may be awarded as cash equivalent incentives only and will have a lifetime limit of \$650.00 per participant.

Stipends	Award Amount	Maximum Number	Example Documentation
Hours attending occupational training (in person or virtual)	\$10- \$15.00/hr.	# Of hours in training	Attendance verification form

Documentation: Incentive and stipend award payments are available to participants based on participation and activities documented in the participant’s IDP. The Workforce Specialist shall maintain required documentation detailing the distribution and management of awards. EMI shall require all service providers and/or grantees receiving funds from ARPA Workforce Development programs comply with this policy and applicable procedures.

Incentive and stipend award payment documentation shall follow the requirements listed below:

- The participant’s IDP must identify the activity, work experience, education, or training that the participant will participate in and the corresponding incentive award(s) and/or stipend that can be achieved and noted in ETO & the ASSET system.
- The participant’s file must include documentation of the achievement of each milestone for which s/he received an incentive; include documentation of attendance in training for which s/he received a stipend.
- Record the provision of incentive and/or stipend payments in ETO & ASSET.
- Incentive awards are payable in gift cards which must be distributed in person – no e-cards. Gift cards must be tracked when purchased with grant funds and the Workforce Specialist must document who the gift cards were issued to and the affirmation of the participant. Maintain numerically identified log showing distribution. Log should be reconciled at least quarterly.
- Stipend awards are payable as checks. Participants must sign for stipend checks when they are picked up, or they will be placed in U.S. Mail or made via Direct Deposit.

It is the responsibility of service providers and/or grantees receiving funds from ARPA Workforce Development programs become aware of all applicable regulations and to monitor personnel and client activities to ensure compliance. EMI shall review service provider and/or grantee compliance with this policy during the monitoring process.

D. PAID WORK EXPERIENCE (Transitional Jobs)

Background: EMI currently does not have a Paid Work Experience or Transitional Jobs policy. ARPA Workforce Development programs provide for paid work experiences that take place in a workplace for a limited period of time. Work experience is an activity designed to enable participants to build a work history, occupational skills, and exposure to the working world.

Transitional Jobs is an employment strategy that seeks to transition people with labor market barriers into wage-paying jobs that allow low-income, unemployed men and women to do useful work and support themselves and their families. Transitional Jobs—in combination with earning supplements, affordable childcare, and affordable health care—are key to reducing poverty and increasing employment, as shown by several rigorous analyses by the independent, nonpartisan Urban Institute. EMI champions effective transitional jobs strategies and is a member of the Public Policy Forum’s “Milwaukee Transitional Jobs Collaborative”.

Paid Work Experience will be recommended by the Workforce Specialist for participants who are lacking a positive work history or are experiencing barriers to employment. Incentives are available to participants who achieve prescribed milestones (see Section C, Incentive and Stipend Payments).

Eligibility: Participants must be enrolled and participating in an ARPA Workforce Development program.

Partner Organization and Placement Site

The Partner Organization can be a non-profit organization, government agency, or for-profit business. The Placement Site may or may not be at the same location as the Partner Organization.

D1. Employ Milwaukee, Inc. (EMI) as the Employer of Record.

Wages: Wages will be paid at either the business’ current wage rate for that position, or the industry standard in the region for that job title, using Milwaukee County LMI from [Job Center of Wisconsin](#), **but not less than \$11/hr.** ARPA Workforce Development program work experience jobs may not be used to aid in the filling of a job opening directly or indirectly that is vacant because the former occupant is on strike or is being locked out during a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. No benefits are provided, other than Supportive Services.

Hours: **Participants can work a maximum of 29 hours per week, for a maximum of 6 months.** Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law exists. ***Length of the paid work experience may be adjusted to ensure that costs remain within the recommended \$10,000 cost per participant.***

Monitoring: Work Experience Host worksites are monitored by ARPA Workforce Development staff, and the ARPA Workforce Specialist will work with the participant on any worksite issues throughout the duration of the work experience. ARPA Workforce Development staff will work with the business and the ARPA Workforce Specialist will work with the participant. Together, the staff will work to resolve any issues.

Worksite Agreement: Partner Organization representatives are required to sign a Participant Placement Agreement and a Placement Site Agreement before the participant can start work. The Agreements must include: the trainees job description, skills to be taught, time frame for the training, who will be providing the training, and how the training will be taught. The Agreements will detail the responsibilities of EMI as the Employer of Record, and those of the Partner Organization and placement site (if different than the Partner Organization).

Eligibility for Concurrent On-The-Job Training (OJT): The paid work experience may be followed by an OJT

contract, assuming the worksite demonstrates an extraordinary training need and the participant is performing more advanced work than during the work experience. The OJT contract would need to be approved before the participant's work experience concludes and before the OJT begins.

E. On-The-Job Training

Background: EMI's current On-The-Job Training (OJT) policy is 20-03 (effective 12/3/20). This policy states that the reimbursement rate to the employer is up to 50% of the wage rate of the participant; and may be increased to 75% under limited circumstances. The exceptions to the current OJT policy for ARPA Workforce Development programs are as follows:

- Reimbursement rate to the employer is 75%.
- If applicable, fees for pre-employment or pre-training drug testing, background checks and medical exams may be covered through a participant's supportive services with documentation;
- ARPA Workforce Development OJT contracts may follow a paid work experience, assuming the worksite demonstrates an extraordinary training need, and the participant is performing more advanced work than during the work experience. The OJT contract would need to be approved before the participant's work experience concludes and the OJT begins.
- Due to modified business practices because of COVID-19 and social distancing, training plans may include virtual training components as part of the overall training plan. However, training plans must include hands-on components as well.

Revisions: Administrative Memo 21-02 (Transitional Jobs Guiding Principles).