



MASSACHUSETTS

Workforce Investment Act

WIA Communication No. 03-29

Policy **Information**

To: Chief Elected Officials
Workforce Investment Board Chairs
Workforce Investment Board Directors
Title I Administrators
Career Center Directors
Title I Fiscal Officers
DET Regional Directors
DET Area Directors

cc: WIA State Partners

From: Jane Edmonds, Director
Department of Workforce Development

Date: November 25, 2003

Subject: DET Principles for National Emergency Grants (NEGS)

Purpose: To transmit the Commonwealth's policy regarding the administration and operation of National Emergency Grants (NEGs).

Background: National Emergency Grants (NEGs) are Title I discretionary funds for dislocated workers awarded by USDOL to address significant layoffs for populations in need and where formula or other funds are not available to provide quality services to those individuals. As funds (especially for training) are limited and have been reduced annually, workers coming to the One-Stop Career Centers in large numbers relating to company layoffs generally exceed the capacity (funds, staff, space) of the centers to provide the services needed to re-employ these customers. Often, a particular local area experiences several mass layoff situations, further draining the capacity at those Career Centers. Therefore, the National Emergency Grant (NEG) Committee of the Division of Employment and Training (DET) works to identify the need for a National Emergency Grant based upon the timing and size of the layoff, the demographics and skill levels of the population, availability of funds, etc. Grants are most often written for populations in need of a high level of intensive and training services.

With the implementation of WIA, local areas have attempted to mirror services for the NEG grant customers to the services provided at the Career Centers. As noted, the Career Center services, especially training funds, are not always adequate to meet the specific needs of the workers who would be targeted for an NEG. To date, the United States Department of Labor (USDOL) has not issued NEG Regulations under WIA to guide the state and local areas in the development, implementation and oversight of NEGs.

USDOL's expectation for NEGs articulated in the draft NEG regulations is that, although NEG "projects should be generally designed to operate in conjunction with the policies and structures of the local One-Stop System, NEG projects are intended to be focused, quality-based responses to significant dislocation events and, therefore, NEG funds should be used to supplement and enhance the ability of local systems to achieve high quality employment and earnings outcomes for the workers affected by these events." Therefore, USDOL allows for variance from the local area policies to encourage specialized services to be provided and the approval of funds to provide the intensity of services required for the targeted population. USDOL also expects that NEG operators will conduct intensive outreach campaigns to ensure that all impacted workers are aware of and are able to receive services.

Through an NEG, funds are assigned to assist workers from a particular company or companies, therefore USDOL expects that these workers will receive: highly accessible services through a streamlined service process; timely registration; individualized guidance to empower the worker to establish appropriate reemployment and earnings goals and select appropriate training programs and providers; and opportunity for high quality employment and earnings outcomes.

Currently, the level of understanding among local area operators of NEGs ranges from general understanding of USDOL expectations and principles to belief that these funds merely supplement formula funds and in that regard, laid-off workers should receive through an NEG the same services as other dislocated workers registered or enrolled at the Career Center. This often means that NEG customers are on wait lists for orientation and counseling sessions; that they are guided toward self-directed services versus individualized intensive services even when they need assistance; and are subject to a low training cap. Such factors render it difficult for the customers and the program to meet USDOL's high performance standard expectations for NEGs.

Therefore, the NEG Principles are intended to provide guidance to local areas regarding the levels, timing and kinds of services which should be provided to NEG customers and to support consistency in operation of NEGs across the state.

The information provided herein has been prepared based upon the former National Reserve Account (NRA) Regulations, the draft NEG Regulations, feedback from the NEG National Workgroup and past history with successful NRA and NEG projects. This information has been communicated in a number of ways including an NEG training session held in June 2002 for all NEG operators, through meetings with the LWIBs and Administrative Entities in whose area the need for an NEG grant has been identified and

through ongoing technical assistance provided to the NEG projects during start-up and operation.

Policy: The Commonwealth's policy regarding the administration and operation of National Emergency Grants is attached. This policy shall apply to all NEG project operators.

Action

Required: Please distribute this policy to the appropriate staff.

Effective: Immediately

References: Federal Register, September 25, 1996 - Job Training Partnership Act: Title III National Reserve Grants - Application Procedures; Notice.

Inquiries: Questions related to this policy should be directed to Diane Hurley (617) 626-5693.

Filing: Please file this in your notebook of previously issued WIA Communication Series Issuances as #03-29.

DCS PRINCIPLES

For NATIONAL EMERGENCY GRANTS (NEG)

NEG Projects provide value-added, accelerated, timely, specialized, individualized services to grant customers. To accomplish this, the NEG project must provide the appropriate location, staff and resources for participants and be recognizable to the customer. NEG funds are discretionary funds provided for the purpose of providing a higher intensity of services to specific populations than would be available through formula funds.

Mindset of Inclusion vs. Exclusion (Paradigm Shift)

Customer Selection

NEG Operators must start with the assumption that they can serve every NEG customer through the grant and then individually determine which services the person is eligible for (screening in rather than out). The fact that an NEG was submitted and approved assumes a certain level of need.

- Customers should be enrolled as soon as possible following the delivery of one intensive service. Projects should not wait to enroll individuals until they are entering training.
- Factors such as education level, past job, etc. does not automatically exclude a customer from training or other services.

Operator Selection

The WIA Title I Fiscal Agent will be designated as the Operator of the National Emergency Grant.

Center Location

The timing (all at once or staggered) and size of the layoff, target group and Career Center capacity should be taken into consideration to determine the appropriate location for service delivery and be negotiated on a case-by-case basis between DCS and the local area. The location should have a separate, distinct identity and be readily available to customers.

- Dedicated space where dedicated staff can be located to provide customers with immediate assistance.
- A sign or banner to let people know that services are there and targeted for them.
- Adequate space to provide the necessary specialized and intensive services (resource room access, computers, workshop space, etc). Customers should not be part of the normal waitlist at the Career Center.
- Convenient to most workers' residences and the travel access needs of specific populations.
- Space donated by the employer should be considered.

Staffing

Staffing for the grant must include dedicated staff assigned to the grant in proportion that is adequate to deliver the planned grant services at the level outlined above. Staff assigned to the grant must work proactively rather than reactively. Peer counselors from the affected workforce are highly recommended when possible and appropriate.

- Appropriate % of a full-time employee (FTE) must provide project oversight in accordance with the size of the project.
- Must include a full-time, dedicated Project Manager.
- Number of Counselors/Case Managers should equal 1 FTE for every 50-80 customers depending upon the needs and/or demographics of the population.
- Outreach staff is essential especially in the early phase of the grant.
- Staffing should be phased in and out based upon the layoff and enrollment pattern for the grant.

Case Management

Case Management is a process and functional area, in which a staff person (or team) helps design and coordinate a program of services with a customer. It is based on a partnership between staff and a customer. Customer and staff have distinct responsibilities toward the customer's satisfactory re-employment and linking to the Career Center system components for support and as an ongoing resource.

An underlying principle of NEG's is that customers will receive intensive and on-going case management and coaching at approximate thirty day intervals while enrolled in the NEG and especially at key junctures such as objective assessment, training research, enrollment into retraining, training completion, job development, job search, etc. During training, it is essential that this contact is maintained to support attainment of customers' objectives and NEG objectives.

Coaching is defined as providing assistance to an individual to solve a problem and/or eliminate a barrier affecting the attainment of customer goals through direct discussion and guided activity.

All interactions and activities are intended to help a customer continue to move forward to achieve identified goals and ultimately satisfying employment.

- NEG Projects must utilize the MOSES Case Plan (Case Management Tool) for the customer's individual plan.
- Case Management must be reflected in comprehensive customer case notes.
- Case notes and all services must be recorded in MOSES.

Training Caps

If a Project Operator has reasons for imposing a cap this must be negotiated with DCS.

- Operator must not utilize a minimalist cap such as the one used in the Title I Formula Dislocated Worker Program.
- Variable caps should not be imposed based upon educational levels: same cap for all.

- Sound counseling/case management practices as well as fiscal oversight and control form the basis for approving a particular training regardless of cost.
- A training decision should be based upon the individual's Career Development Plan including the individual's current lack of marketability, the local labor market need and marketability of the new career.

Customer Satisfaction Surveys

- NRA grants required completion of Customer Satisfaction Surveys with a performance of 70% very satisfied with services on a five-point scale.
- There are no specific guidelines regarding customer satisfaction surveys for NEG operators since there are no regulations as yet; this information should be captured in the same manner required by the Workforce Investment Act.
- Until USDOL mandates otherwise, NEG Operators should utilize the Customer Satisfaction Process and Forms in MOSES (which were used for NRA grants). Upon award of an NEG, DCS will forward the forms and instructions.

Multiple Operator Grants

- Operators will participate in regularly scheduled project coordination meetings as required to determine and coordinate consistent practices and grant performances.
- Operators will all operate according to the NEG mission regarding services and strive for consistency of services (policies, support services, Needs Related Payments, ITAs, training caps, etc.).
- If a cap is authorized, the cap must be consistent among Operators.
- Operators will work with DCS to reallocate grant funds among project operators based upon identified need that varies from the original project budget and enrollment projections.

Vouchering Component

- NEG operators administering a vouchering component must utilize the Airlines Project model (reviewed and approved by local areas, statewide).
- The local area operating the vouchering component is held harmless regarding performance for the vouchering component enrollments.
- The Career Center providing services to the customer is responsible for determining eligibility for the NEG.