

## **Clean Jobs Workforce Network Program 2024-25 Program Manual**

# Chapter 6: Barrier Reduction Services



## Chapter Overview

By the end of this chapter, you will be able to:

- Complete an Intake Needs Assessment
- Provide barrier reduction services.
- Support participants with complex needs.
- Integrate the six core values of diversity, inclusion and welcoming, accessibility, belonging, and equity into all elements of the program's wrap-around and student support services.
- Comply with Workforce Hub guidance for attendance-based stipends.
- Track participant attendance and academic performance and respond to student alerts in the CEJA Reporting System.
- Develop policies for the make-up of post-assessments and missed sessions.
- Comply with the Americans with Disabilities Act (ADA).

Barrier reduction services include wrap-around support services, student support services, and transition services. This chapter covers wrap-around support services and student support services. Transition support services will be addressed in **Chapter 8: Program Completion Transition Services and Follow-up**.

Barrier reduction services			
Wrap-around support services	Student support services	Transition services	

Barrier reduction services help participants overcome barriers to participation and empower participants for resilience and self-sufficiency. Together, they create a supportive service package that

helps minimize or eliminate non-academic and academic barriers to participation. For CEJA Workforce Hubs, barrier reduction services are funded through Energy Transition Barrier Reduction funds and are *not* subject to performance-based repayment.

Barrier reduction **wrap-around services** are defined as services that address non-academic barriers. These can include various items including, but not limited to, childcare, mental health counseling, and transportation. In order to receive these services, participants must **opt in** first. This model of services leads to greater self-sufficiency as it challenges participants to think through long-term planning for services. All too often, programs provide a suite of support for participants while in the program, but when the program ends, participants are left without the skills or knowledge of how to address those needs. With the opt-in model, participants will meet with Barrier Reduction staff one-on-one to establish services during the program and begin making long-term plans to address these needs.

Barrier reduction **student support services** are defined as services that address academic needs. Unlike wrap-around services (determined via the service needs assessment), some of these supports are mandatory for participants based on subpar attendance or performance. Participants may opt in to services such as tutoring for math and reading. However, other services, such as making up hours for missed sessions, retaking post-assessments after failing, or attending tutoring for specific modules where academic performance is lacking, are mandatory to complete the program. Through these services, students will gain lifelong skills to set the foundation for future growth and opportunities.

## Providing Services Equitably

Staff who conduct intake and service needs assessments must do so with keen attention to the **six core equity values** outlined in Chapter 2. Barrier reduction staff are accountable for creating and encouraging a judgment-free environment:

- Do not make assumptions about what participants may or may not need or may or may not know.
- Ask questions based on the assessment and explain the various service options provided.
- Inform and guide participants through the process and encourage active questioning. If something goes unsaid, it could lead to miscommunication and unmet needs.

**Promote openness**—there are no stupid questions—empower and encourage self-defined individual and group identities. Participants can draw strength and confidence from how they see themselves and the communities they are part of. Importantly, staff and everyone in the program must use **person-first language** that avoids defining individuals or groups by one narrow label or adjective (e.g., use *person/people with disabilities* instead of disabled person, *person/people of color, person/people with undocumented status*). Person-first language does not begin with an aspect of how society sees them but instead attempts to include that characteristic as only one part of a greater whole. Participants are unique individuals that are **not** defined by one characteristic of their multifaceted identities.

Providing **barrier reduction services** is a huge part of ensuring **equity-eligible populations** can benefit from being part of the clean energy industry. Providing these services equitably must not be an afterthought or taken for granted. Equity-eligible populations face challenges that result from how society treats differences and has historically discriminated against underserved groups. Staff must know these challenges and cultivate a supportive environment free from prejudice and judgment. Doing so will help promote empathy, successful communication, and understanding, which are all necessary to meet the needs of program participants and ensuring successful outcomes.

## Service Needs Assessment

The **Service Needs Assessment** is a CEJA Reporting System tool that aims to identify the wrap-around service needs and student service needs of participants. The assessment collects the following:

- Accommodations and Student Services
- Technology Assistance for Virtual Learning (Broadband and Hardware - If Virtual Learning Will be Employed)
- Transportation
- Childcare/Family Member Care
- Assistance with Housing
- Food
- Healthcare
- Legal Assistance
- Financial Literacy
- Mentorship
- Application Fees
- Other Support Services

Note: If there is a needed service not on the assessment, it can be added manually. Barrier reduction service must first be submitted to the grantee's Grant Manager for approval. After approval, the service can be added to the CEJA Reporting System and provided to the participant.

Each participant **must** complete this assessment with a barrier reduction staff member, as part of their intake process. Each service on the needs assessment provides a summary, examples, and guiding questions that the barrier reduction staff can utilize when meeting with participants.

## Wrap-around Services

The goal of **wrap-around services** is to **minimize or remove barriers** so that participants have an equitable opportunity to complete training and transition to employment, advanced training in clean energy, or a Registered Apprenticeship Program (RAP).

CEJA's focus is on individuals in equity investment eligible communities, graduates of or current enrollees in the foster care system, and individuals with barriers to employment, all of whom have been underrepresented in the clean energy industry. Grantees are expected to identify and address barriers that may impede these groups from completing the training program and entering an apprenticeship program. Many complex and interconnected barriers can hinder a participant's access to employment opportunities. For instance, racism and sexism may intersect with an African American mother's need for childcare and transportation, exacerbating exclusion from an industry traditionally dominated by white males.

CEJA Workforce Hubs grantees will provide barrier reduction services to address these structural and historic barriers. Grantees can deliver these services internally or leverage partnerships to do so. If partnerships are leveraged, grantees should identify partners with culturally responsive organizations. For example, when providing English Language Learner services, match participants with mentors who have shared experiences. Apply equity values when considering partnerships so they understand the spirit of CEJA.

## **Transportation Costs**

A significant barrier for many participants in the program may be reliable and accessible **transportation**.

- Allowable Costs: Public transit fare/cards, car repairs, gas cards, plate sticker/city sticker renewal fees, insurance fees, rideshares, or taxis (Lyft and Uber, among others, when other options are unavailable).
- Non-allowable costs: Car lease or purchase.
- Guiding Question(s): Do you have reliable transportation to and from the program? If yes, what is your primary form of transportation?

## Identification and Driver's Education Fees

A **driver's license** is not required to participate in the CEJA Workforce Hubs. However, it may be a requirement for employment, additional training services, or apprenticeship programs. If participants need to complete driver's education while attending the training program, the program may pay the required fees for driver's education and/or to obtain a license/identification card.

- Allowable Costs: Driver's education lessons and new/renewed driver's license/identification card costs.
- Guiding Questions: Do you need help getting a Driver's License or Identification Card? Are you confident you can cover all costs of obtaining your Illinois Driver's License no later than completing the program? Are you confident you can cover all costs associated with driver's education?

### Childcare/Family Member Care

**Caregiving** for a child or a family member can be a major barrier to participant success. CEJA allows for partial or total care costs. However, programs should also attempt to leverage alternate resources to help cover these costs.

- Allowable Costs: Childcare/babysitting costs, home aide costs.
- Guiding Question(s): Do family members depend on your care? If yes, will you need assistance with your family member's support/care while in the program?

#### Healthcare

A participant's **physical** and **mental health** can be a major barrier to success. Partial or total healthcare costs are allowed under the grant. However, programs should also attempt to leverage alternate resources to help cover these costs.

Drug testing is not a requirement of the CEJA Workforce Hubs Program, but participants must be aware that drug testing is required by many employers. In addition, substance use issues may be a barrier to participation and completion for participants. Barrier reduction staff must ask if participants need services to address drug or substance use concerns so that they can pass drug tests and complete the training.

- Allowable Costs: Doctor visits, medical care, alcohol and substance use counseling and treatment, mental health counseling, trauma counseling, dental care, and vision care.
- Guiding Questions: Are there any physical or mental health needs you need help addressing to succeed in this training program? Are you able to pass the drug tests required by most apprenticeships? Would you like to receive support to pass a drug test?

#### Housing

Some participants may struggle to maintain **stable housing**, which can be a major barrier to participation. It can impact their ability to find reliable transportation to the program, the accuracy of the record (I.e. driver's licenses) they need to gain employment, their physical and mental health, and access to food and the internet. While housing costs are allowed under the barrier reduction fund, programs should also attempt to leverage alternate resources to help cover these costs.

- Allowable Costs: Rent, deposits for rent, emergency housing costs, mortgage/tax/insurance payments, emergency home repairs to maintain habitability, storage of personal effects in case of eviction, and utilities. (Note: participants may need assistance understanding some of these complex topics. See Financial Literacy below and the training module in Chapter 7.)
- Guiding Question: Do you need support maintaining stable housing in this program?

### **Financial Literacy**

The ability to manage money competently is a skill that can have a positive lifelong impact on students and help them far beyond the program. **Financial literacy** courses teach participants the basics of personal finance mechanisms such as budgeting, saving, debt, and investing. These courses may also cover items such as explanations of pensions, retirement funds, and fringe benefits, among others.

- Allowable Costs: Course materials (handouts, workbooks, etc.), course/class fees, and financial literacy online course fees.
- Guiding Question: Do you feel confident managing your finances, including budgeting, saving, investing, or debt management? Would you like support with managing your cash flow?

#### **Nutritional Assistance**

Hunger is a major barrier to successful participation in the CEJA Workforce Hubs. Hungry people are not in a position to learn. Some programs may maintain a food pantry, and others may choose to provide funds to help participants purchase groceries.

- Allowable Costs: Groceries and gift cards to grocery stores.
- Guiding Questions: Do you need assistance buying food to be successful in this program? Are you interested in applying for SNAP?

#### Legal Assistance

Some participants may require **legal services** to clear the way for their placement into a job, advanced training, or a Registered Apprenticeship Program. Under the CEJA Workforce Hubs grant, partial or total funding of legal services necessary to complete the program and be placed into a clean energy job is allowed.

- Allowable Costs: Costs associated with expunging or sealing records, obtaining or reinstating
  revoked or suspended driver's licenses, untangling outside court debt issues, assistance with
  child support orders, certificates of rehabilitation, assistance preventing illegal evictions,
  resolving credit report problems, filing for domestic abuse restraining orders, assisting veterans
  with accessing healthcare, education grants, and housing services.
- Guiding Question: Would you like to receive legal assistance services like help sealing or expunging your record?

## Technology Assistance (Broadband and Hardware)

Most programs require participants to have access to computers and/or smartphones for communication with program staff, virtual learning activities, homework, and job/apprenticeship search activities. If participants do not have the proper **technology** to participate in the program, the grantee may utilize funding to assist the participant. It is **recommended** that organizations attempt to enroll participants in existing broadband and technology assistance programs before directly paying for or purchasing goods and services.

Note: Efforts to enroll participants in existing broadband and technology assistance programs can be documented as a part of the participant's case notes.

- Allowable Costs: Broadband/hot spot fees, cell phone and data plan payments, equipment such as modems or routers to establish an in-home internet connection, purchase of laptops for lending to participants.
- Guiding Questions: Do you have steady and reliable access to the internet? Do you have a computer that will allow you to access lessons, including online instruction and videos? Do you have a current and reliable phone service? Do you feel confident using technology, including emailing, navigating the internet, and completing basic tasks on a computer?

### Accommodations

Grantees have an ethical and legal responsibility to comply with the **Americans with Disabilities Act** (ADA). They must make reasonable accommodations to provide access to the program and facilitate the participant's learning. All buildings where training is provided must be ADA-accessible. Additional accommodations may have costs associated with them, while others may not. Staff may be able to provide some services but may need to hire or make referrals to others. The important thing to remember is that reasonable accommodations must be made to provide access to all eligible participants.

- Allowable costs: Screen reader assistance, sign language interpreters, assistive listening devices.
- Guiding Question: Do you need accommodations such as a screen reader, assistive listening device, or sign language interpreter to participate in training?

#### Other Wrap-around Support Services

There may be necessary and reasonable costs to support participants beyond the current identified services. These services can be fulfilled through referrals, leveraged resources, or, in some cases, CEJA Workforce Hub grant funding. **If the grantee wants to allocate CEJA Workforce Hub grant funding for** 

additional services not described in the Service Needs Assessment, the support service must first be submitted to the grantee's assigned Grant Manager for approval. Only after approval can the grantee add the service to the CEJA Reporting System and provide the service to the participant.

• Guiding Question: Are there additional supports to ensure your attendance and completion of the CEJA Workforce Hubs Program?

## Wrap-around Service Examples

To assist grantees with responding to wrap-around service needs, multiple wrap-around support service examples are provided. Use the following tables to identify **potential gaps** in services and to **strategize** about how to fill those gaps.

**Table 6.1** provides examples of how grantees can assist participants in overcoming barriers. These barrier reduction service needs may be delivered internally by grantees or through referrals and have allowable costs associated with each barrier.

Examples of Barriers	Participant Challenge	Allowable Costs to Assist in Overcoming Barriers
Low Income	It may be difficult for some participants to stay financially solvent during the training period. They may also need help getting started as they prepare to enter an apprenticeship.	<ul> <li>Apprenticeship application fees</li> <li>Broadband/hotspot fees</li> <li>Laptop purchase to loan to participants</li> <li>Housing costs like rent and utilities</li> <li>Financial literacy course fees or purchase of training materials</li> </ul>
Childcare/Family Member Care Needs	Some parents may face challenges obtaining quality childcare that meets the training schedules.	<ul> <li>Childcare/family member care fees</li> </ul>
No Driver's License and/or No Reliable Transportation	Many jobs in the clean energy trades require reliable personal transportation, as travel to different job sites is typical.	<ul> <li>Driver's education fees</li> <li>Public transit fare/cards</li> <li>Car repairs</li> <li>Gas cards</li> <li>Plate sticker/city sticker renewal fees</li> </ul>

Often, grantees must **leverage partnerships** with other organizations to best serve participants and ensure they have an equitable opportunity to complete training and transition to employment. The

table below suggests partners that grantees can engage to assist participants with challenges requiring additional support.

Examples of Barriers	Participant Challenge	Potential Partners
Physical Health	Self-reported or family health issues may limit the ability to complete training programs and obtain/maintain employment.	Local/county health center/department
Substance Use	The trauma inflicted by systemic oppression and racial and sexual discrimination, among other social challenges, can sometimes lead to mental health and substance use disorders.	Local behavioral health centers & organizations, community mental health centers & organizations
Mental Health	Mental health conditions such as depression, anxiety, PTSD, and others can make active participation in programming difficult due to limited energy, disruption of normal physical functioning, inability to concentrate, and more.	Local behavioral health centers & organizations, community mental health centers & organizations
Domestic Violence	Participants who are experiencing domestic violence may find it more difficult to attend or complete training programs and obtain/maintain employment.	Domestic violence service providers, Department of Health & Human Services
Housing Instability / Homelessness	Some participants may face difficulties finding permanent housing or are homeless.	Public housing authorities, Community Action Agencies
Public Assistance (e.g., TANF or SNAP)	Some participants may fear the reduction in cash and food assistance that will result from their participation, or they might be experiencing hunger, which makes it difficult for them to participate effectively.	Department of Health & Human Services, Community Action Agencies

Table 6.2: Other Participant Barriers and Potential Partners

In addition to the barriers in Table 6.2, some populations may experience **specific challenges** or a combination of challenges that require the provision of a broad spectrum of services by a broad spectrum of partners (see the table below). They must be provided with resources, referrals, and information about programs and agencies that can assist them in addressing their specific barriers.

Note: For more information on developing partnerships, see **Chapter 3: Partnerships.** 

Population	Challenge for Special Population	Potential Partners
Youth (under 18)	Homeless youth may have experienced trauma before and after becoming homeless; they may have been involved with the child welfare or juvenile system, experienced family conflict, racial disparities, and/or mental health or substance abuse disorders.	Department of Health & Human Services, local behavioral health center & organizations
Returning Residents	When transitioning from prison, returning residents may find it difficult to reintegrate into their communities; they may also face challenges such as social stigma, lack of job readiness, lack of an ID, financial instability, and housing insecurity.	Department of Health & Human Services, public housing authorities, reentry organizations, Community Action Agencies
Undocumented Persons	Undocumented persons may face challenges such as temporary or no work authorization, no social security number, or no path to citizenship or permanent residency; they may also face negative stigma associated with their immigration status or fear of deportation.	Illinois Coalition for Immigrant and Refugee Rights (ICIRR), Department of Health & Human Services
Immigrants	Immigrants may experience language and cultural barriers as they develop English proficiency and adapt to a new culture.	Department of Health & Human Services, Illinois Coalition for Immigrant and Refugee Rights (ICIRR), translation services
Veterans	As a result of experiences in combat situations, many military veterans have Post-Traumatic Stress Disorder (PTSD), which can sometimes lead to other challenges like homelessness and substance abuse disorders.	Veteran's Administration, local behavioral health center & organizations

## Table 6.3: Barriers for specific groups/populations

## **Student Support Services**

Participants may have a variety of student support needs that must be addressed to help them successfully complete the program. Barrier reduction funds may be utilized for the following student support services.

#### Tutoring

It is common for participants to need additional assistance outside of regular classroom hours. Certain topics, especially math can create a barrier for participants to advance in a program. Grantees should be prepared to offer additional tutoring on all subjects. This can be completed by the instructor(s) or by a partner agency.

- Allowable Costs: Partner with a tutoring service, additional hours for instructors, additional training materials or information aides.
- Guiding Question: Are there any topics that you may need additional support on?

#### Assistance with Educational Testing

Testing can cause anxiety for many participants. To be successful in a program, they may need accommodations during testing periods. These accommodations may include, but are not limited to, extended time to complete tests, quiet space to complete testing, hard copies of tests instead of web-based testing.

- Allowable Costs: staff time for extended testing periods, hard copies/printed tests among others
- Guide Question: Some participants benefit from more time to take tests or changes to their space to be able to focus on their test. Would you benefit from either of these or other changes during testing?

#### Mentorship

A **mentor** is an individual who develops a long-term professional relationship with participants to provide career guidance, advice, and support. The mentor is expected to serve as their role model, sponsor, and advocate for their mentee's professional development. Providing a mentorship program for participants can help increase the rate of long-term career success. These interactions are often structured and provided by the grantee or a partner agency.

- Allowable Costs: Mentor/mentee training, mentor-planned activities, expenses related to mentorship events, and training materials.
- Guiding Question: Would you be interested in being partnered with a mentor?

### Alumni Networking (Support Services)

Building long-term relationships with former program graduates can significantly benefit current participants. This service may include connecting participants and alumni one-on-one. Unlike mentoring, **alumni networking** is often a time-limited interaction instead of long-term professional relationship building. While it is likely that alumni events will take place throughout the program for all participants, this service is specifically geared toward one-on-one meetings with alumni.

• Allowable Costs: None.

• Guiding Question: Would you benefit from being connected to our program graduates working in the trade(s) you're interested in?

Note: There is **Alumni Networking (Support Service)** and **Alumni Networking (Transition Service)**. Alumni Networking (Transition Service) is addressed in Chapter 8: Completion and Transitions.

### Other Student Support Services

It is possible that organizations will accept a participant that needs additional academic support beyond what is listed above. As a result, grantees may submit requests for other support services to best support participants. These services can be fulfilled through referrals, leveraged resources, or, in some cases, Workforce Hubs grant funding.

If the grantee wants to allocate Workforce Hubs grant funding for a service not listed above, the service must first be submitted for approval to the grantee's assigned Grant Manager. Only after approval can the grantee proceed to add the service to the CEJA Reporting System and provide the service to the participant.

- Allowable Cost: Determined by approval of the request submitted to Grant Manager
- Guiding Question: Are there additional supports that would support your attendance and completion of training program?

## Student Support Services Examples

**Table 6.4** below provides examples of student support services that can be provided to support participants' success in the training program. Use the table to identify potential gaps in student support services and consider how to fill those gaps successfully.

Examples of Barriers	Participant's Challenge	Student Support Services
Low Levels of Literacy; Lack of Basic Math, Reading, and Computer Skills	Some participants may lack the basic math, reading, and computer skills that are prerequisites for entering apprenticeships in the clean energy trades.	Tutoring by program instructors or partners
Difficulty with Content Covered in Certain Modules	Participants may have trouble understanding certain content covered in some modules and/or difficulty developing the required skills to complete a module successfully.	Tutoring by program instructors or partners

## **Tracking Barrier Reduction Services**

Once the **Service Needs Assessment** has been completed in the **CEJA Reporting System**, each participant will have an itemized list of services and any associated costs. For technical instructions on how to track service needs, visit the CEJA Workforce Hubs Partner Guide.

### Referrals and Leveraging Available Resources

For each support service selected, grantees may provide the service in-house or refer participants to other organizations. Grantees should refer participants to other service professionals when the other professionals' specialized knowledge or experience is needed to serve participants fully or when geographical distance dictates that the other service provider would be more convenient for the participant to access.

While CEJA provides funding to address a comprehensive set of barriers to participation in workforce training programs, DCEO encourages grantees to leverage existing funding programs to provide services more efficiently to participants. Leveraging existing resources can help CEJA money go further and provide opportunities and assistance to more participants.

The **CEJA Workforce Hubs Partner Guide** provides information about several state, federal, and other programs to assist participants in accessing available resources for housing, food, transportation, and other needs.

## Check-ins and Case Notes

Participants' needs may change throughout the program and into the transition period (when applying for and beginning their apprenticeship program or jobs). For example, the instructor may recommend that the participant get math tutoring so that they can complete program requirements, their car may break down and need car repairs, or perhaps their childcare provider falls through.

Barrier Reduction staff **must maintain regular contact with participants** to reassess needs and make sure needs are being met during training and afterward. At a minimum, the barrier reduction staff must check in with participants every thirty days during training and as needed. Regular check-ins should be tracked using the case notes in the CEJA Reporting System.

At each check-in, **staff must reassess the participants' needs** and ask if there is anything else that they need support with. They must use the student support tabs to address these needs. If no additional support is needed, **staff must still enter a case note** in the reporting system explaining that the check-in was completed, and no additional assistance was needed.

They can add new services and referrals to the participant's CEJA Reporting System profile and provide follow-up support. After each check-in, staff **must** enter a case note in the participant's CEJA Reporting System profile to record what was discussed and coordinate services with other staff.

The case notes may include the following information, as appropriate:

- Date of check-in
- Progress in the training program
  - Need for make-up classes/testing
  - Need for extra tutoring/support
- Barriers to attending/completing training
  - Need for additional supports services
- Any action items to address
- Any new appointments that have been scheduled

Case notes are vital to communicating internally at the grantee organization, but also with grant managers. These tell a story of the participant's interactions with grantee staff. Below are some case noting best practices:

• Keep case notes factual -

Case notes should not feature the author's opinion or personal feelings, instead they should only state the facts of the situation.

*Factual case note:* "Barrier Reduction staff called participant on 2/6/2024 to follow up and left a voicemail. Caller requested a call back. This is the third follow up call.

*Opinionated case note:* "Barrier Reduction staff called the participant for the third time, and he still did not pick up. Left a voicemail but doubt he will get a call back.

• Use descriptive titles or subject headings -

It is common for case notes to be entered in a rush, but it is important to add titles or subject lines that will help the next person understand what took place. This also can help to search for keywords or filter case notes for later use.

Descriptive title: 2<sup>nd</sup> Follow up call to participant – left voicemail

*Non-descriptive title:* Case note – 2/6/2024

• Provide valuable information with substance -

Case notes should provide the reader with useful information that can be acted on or informs them of a current status that cannot be viewed in other areas of the reporting system. Think about case notes as writing the story of the participant. Each note should advance that story.

*Informative case note*: "Spoke with participant on 2/6/2024. Participant needs transportation assistance. Submitted request for funding and will provide participant with bus card during the next session on 2/7/2024."

Non-informative case note: "Participant who is actively enrolled called about transportation"

The information above and additional best practices can be located through <u>Workforce GPS – The Role</u> of Data Tracking and Documentation in Effective Case Management and Career Counseling

## Attendance-based Stipends

**Grantees are required to provide a stipend to all enrolled program participants**. Stipends are payments made to a trainee or learner for living expenses and are designed to ensure that participants can maintain financial solvency throughout the program.

All grantees must comply with the attendance-based stipend policy (see the CEJA Workforce Hubs Partner Guide). Any modifications to the stipend policy must be submitted to DCEO for approval.

All policies must include the following items:

• Grantees must provide stipends, not to exceed \$13 per instructional hour. Instructional hours are training time spent in a classroom, construction lab, worksite practicum, or make up hours.

Stipends may not be paid for hours spent on barrier reduction service needs, student support, transition, or follow-up services.

- Participants should receive their stipend either weekly or biweekly. *Note: monthly payments are not allowed.*
- Stipend amounts must be the same for all instructional activities. Instructional activities that qualify for stipend payouts include classroom instruction (face-to-face, remote, or hybrid), construction lab instruction, and job site/practicum experience. Participants must receive the same per-hour stipend for all these instructional categories. Stipends cannot be paid out for asynchronous instruction.
- Stipends can only be provided to participants. To qualify for a stipend, participants must actively enroll in the training program.
- Participants will only receive a **stipend per instructional hour,** for the sessions they attend. For example, if they miss an hour of class, their stipend will be reduced by \$13. Tardiness at the start of each scheduled day and late return from breaks may result in stipend reductions.

**CEJA Workforce Hubs offer a stipend, not a wage.** As noted above, a stipend is a payment made to a trainee or learner, not an employee. As outlined in the Notice of Funding Opportunity (NOFO), the stipend is provided for the duration of the training program. Additionally, since stipends are **NOT** wages, Social Security and Medicare taxes are not withheld. However, stipends are taxable income for income tax purposes for participants. As a result, grantees must provide the requisite tax documents to participants by January 31, following the tax year in which the stipend payments are made.

#### Note: Relevant tax document can be uploaded to the customer's profile for each participant.

For these reasons, it is critical that grantees not use wage language or wage equivalents in their program's outreach and recruitment materials, policies, or discussions with participants related to stipends. It is also crucial to ensure participants understand that taxes will not be withheld, so they **must** budget for an additional tax burden. **Participants must be counseled to report stipends as "scholarship and grants" on their tax returns so that it is not taxed as self-employment income.** A sample attendance-based stipend policy and procedure is available in the CEJA Workforce Hubs Partner Guide.

## Student Alerts and Tracking

To complete the program, participants must have **80% or higher attendance per module.** Participant attendance is tracked in the CEJA Reporting System. Students who drop below the attendance thresholds must make up hours or retake post-assessments. These requirements must be outlined in the participant's commitment agreement.

#### Note: Information about the commitment agreement is available in Chapter 5: Application and Intake.

### Attendance

Participants must attend 80% of the training hours for each module to be considered in good standing. If a student drops below the 80% attendance threshold in a single training module, they must make up missed hours to be considered on track to complete the program successfully.

It is important to note that some credentials or certifications, such as OSHA-10, require 100% attendance. Grantees should ensure participants understand these expectations. If a participant drops

below the 80% attendance threshold (or 100% for specific modules), a red flag alert can be added to the participant's profile.

*Note:* Grantee can select a radio button on the *Customer's Progress* page to confirm if a participant is meeting the attendance requirements. If participants are not meeting attendance requirements, a list is available through the *Dashboard Report*.

Grantees **must** track daily attendance using an **Attendance Roster**, but daily attendance does not need to be entered in the CEJA Reporting System. The roster must be signed and dated by all Instructors/Trainers and staff responsible for reporting and data entry. Corresponding training curriculum/modules and dates must be accurately reported, not including breaks and lunch times.

Note: See the **CEJA Workforce Hubs Partner Guide** for a **Sample Attendance Roster**. Please note that CEJA Workforce Hubs requires an Attendance Roster to be kept on file.

## Participant Evaluation (Post-Assessment Scores)

All **modules** (an instructional unit within a curriculum organized by chronology, topic, or theme) must feature a scored post-assessment at the end of the module to ensure that participants have successfully met learning objectives. Each post-assessment must have a score of 0 - 100%. Post-assessments cannot be pass/fail. Participant scores must be immediately recorded in the CEJA Reporting System to track student progress and to alert Barrier Reduction staff of subpar performance. If a participant scores less than 70% on a post-assessment, grantees can manually add a red flag to the participant's profile.

## Identifying and Removing Red Flags

**Barrier Reduction staff are responsible for identifying the need for coordinating and ensuring the successful delivery of student support services.** These staff members have access to a robust CEJA Reporting System dashboard and suite of reports that will allow them to quickly identify participants with red flag alerts. These alerts are meant to signal participants who need additional assistance.

#### Note: For the complete role description for **Barrier Reduction Staff**, see Chapter 1 under Staff Roles.

Barrier Reduction staff and instructors must meet with participants individually to identify what has caused their attendance or performance to fall below expected standards.

**If a participant's red flags are related to academic needs,** such as excessive absences, missing or failing post-assessments, or struggling with key lessons, the barrier reduction staff must work with the participant to develop an action plan to regain good standing in the program. The action plan may outline dates for make-up sessions or post-assessment retakes, referrals for tutoring services, or more extended periods for participants to take post-assessments. These student support services are entered in the CEJA Reporting System. Once delivered, these services must be marked as complete in the CEJA Reporting System. Grantees are encouraged to develop policies regarding make-up post-assessments and sessions.

If a participant's excessive absences or academic performance are related to non-academic barriers, Barrier Reduction staff must address any barriers preventing the participant from successfully engaging in the program.

If participants are not meeting attendance requirements, grantees should update the reporting system to show that they are not meeting attendance requirements. A red flag will show up on the progress page and dashboard. Red flags for attendance can be removed from a participant's profile when makeup session hours have been completed, bringing the participant to or above the 80% required attendance for the training service. Red flags for post-assessment scores can be removed when the participant scores higher than 70% on an exam retake, and the new score is added to the corresponding training module.

Technical directions regarding removing red flags are available in the CEJA Workforce Hubs Partner Guide.

## **ADA Requirements**

The **Americans with Disabilities Act (ADA)** prohibits discrimination against people with disabilities in multiple areas, including employment, transportation, public accommodations, communications, and access to state and local government programs and services.

Grantees are ethically and legally responsible for adhering to administrative requirements by the Americans with Disabilities Act. Grantees are responsible for compliance with the ADA.

Each program must:

- Develop a plan to reach ADA compliance and accessibility.
- Have a coordinator who will ensure ADA compliance and accessibility.
- Provide public notice of ADA statutes and compliance.
- Have an established grievance policy that includes processes for upholding ADA compliance.
- Conduct a program evaluation of ADA compliance and accessibility.
- Provide accessible program materials that are easily understandable based on a sixth- to eighth grade reading level.

## Additional Resources

See the CEJA Workforce Hubs Partner Guide for the following resources:

- Stipend Policy and Procedure
- Sample Attendance Roster
- Sample Extenuating Circumstances Policy for Make-Up Post-assessments and Sessions