

**City of Los Angeles Workforce Development Board
Local Workforce Development Plan 2017 – 2020**

Addendum 2 – July 23, 2019

The following information serves as an addendum to the City of Los Angeles Workforce Development Board's (WDB) Biennial Local Workforce Development Plan Modification submitted to the California WDB on March 15, 2019, as part of a package from the City of Los Angeles representing the seven WDBs within the Los Angeles Basin. This addendum expands upon the following area of the City of Los Angeles' WDB's Biennial Local Plan Modification:

Department of Child Supportive Services Partnership:

The Local Plan discusses how eligibility criteria for workforce services impacts the Local Boards ability to provide workforce services to the Child Support Program population.

The City of Los Angeles WDB (CLAWDB) and its partners have not found eligibility criteria, beyond selective services requirements, to be a barrier in serving noncustodial parents. The CLAWDB does not impose additional eligibility criteria other than those required under WIOA.

In order to be eligible to receive WIOA-funded services, all males born on or after January 1, 1960, must present documentation showing compliance with the Selective Service registration requirement. All programs and services established or receiving assistance under the Workforce Innovation and Opportunity Act (WIOA) must comply with these Selective Service registration requirements. These requirements apply to both formula and discretionary grants awarded by the Employment and Training Administration under WIOA. They do not apply to programs funded or solely authorized by the Wagner-Peyser Act.

If an individual cannot supply documentation showing compliance with the Selective Service registration requirement, they must obtain a Status Information Letter from the Selective Service indicating whether they are required to register. If the individual was required but failed to register with the Selective Service, as determined by the Status Information Letter or by his own acknowledgement, the individual may only receive services if he establishes by a preponderance of the evidence that the failure to register was not knowing and willful.

If a male non-custodial parent does not meet Title I eligibility due to the absence of selective service registration, policies and procedures are in place to determine if the failure to register was "knowing and willful." AJCC staff will work with the client to provide the following:

Documentation

Evidence presented may include the individual's written explanation and supporting documentation of his circumstances at the time of the required registration and the reason(s) for failure to register. The individual is encouraged to offer as much evidence and in as much detail as possible to support his case. The following are examples of documentation that may be of assistance in making a determination in these cases:

- Service in Armed Forces. Evidence that a male has served honorably in the U.S. Armed Forces such as a Form DD-214 or his Honorable Discharge Certificate. These documents serve as evidence that his failure to register was not knowing and willful.
- Third Party Affidavits. Affidavits from parents, teachers, employers, doctors and others concerning reasons for not registering may help grantees in making determinations in cases regarding willful and knowing failure to register.

Model Questions

The following questions serve as a model when determining whether a failure to register is knowing and willful.

In determining whether the failure was “knowing”:

- Was the individual aware of the requirement to register?
- If the individual knew about the requirement to register, was he misinformed about the applicability of the requirement to him (e.g. veterans who were discharged before their 26th birthday were occasionally told that they did not need to register)?
- On which date did the individual first learn that he was required to register?
- Where did the individual live when he was between the ages of 18 and 26?
- Does the status information letter indicate that Selective Service sent letters to the individual at that address and did not receive a response?

In determining whether the failure was “willful”:

- Was the failure to register done deliberately and intentionally?
- Did the individual have the mental capacity to choose whether or not to register and decided not to register?
- What actions, if any, did the individual take when he learned of the requirement to register?

If WIOA eligibility cannot be established, noncustodial parents can be served under the City of Los Angeles' Workforce Development System's numerous additional grants and/or its network of one-stop partners, city and county programs, and community-based organizations. For example, Title III Wagner-Peyser Employment Services can provide access to employment services, including job listings, job search preparation, and placement assistance. Locally, all AJCC operators are required to identify a minimum of \$600,000 in non-WIOA funds to provide services similar to those funded by WIOA (leveraged resources). Job trainings provided by Los Angeles Unified School District (LAUSD) Department of Adult and Career Education (DACE) (a collocated

AJCC partner), as described in the section below, also do not require selective service registration.

Provisions to English Language Learners, the Foreign Born, and Refugees:

1. The Local Plan describes how local/regional partners will braid resources and coordinate service delivery to English learners, the foreign born, and refugees, including increasing access to sector pathway programs, supportive services and retention efforts.

As an example of braiding resources, the CLAWDB has built a strong collaboration with the Los Angeles Unified School District (LAUSD) Department of Adult and Career Education (DACE), collocating DACE'S WIOA Navigators into the AJCCs. DACE is the largest WIOA Title II funded provider in California and, as such, is an integral part of the workforce development system in the Los Angeles region, providing skill development services for adults with high barriers to employment including English learners, the foreign born, and refugees. DACE provides numerous sector pathway training programs in a variety of languages. DACE also administers the regional Adult Education Block Grant to provide programs for immigrants eligible for educational services in citizenship, English as a second language, and workforce preparation.

Locating DACE Navigators into the AJCCs ensures seamless funding and coordinated services for this target population. Training targeted at this population for the most part is provided by DACE through their funds, while case management and supportive and follow-up services are provided by the WIOA Title I AJCC staff. Examples of Title I supportive services include, but are not limited to:

- Child care and dependent care for dependents of customer.
- Clothing - Adequate clothing to allow customer to wear appropriate work attire while participating in WIOA activities and during job interviews.
- Housing - Temporary shelter, housing assistance and referral services.
- Linkages to community services - Alcohol/drug/gang intervention counseling, drop-out prevention, pregnancy prevention, money management, tutoring or other purposes.
- Referrals to medical services - Referral services to appropriate medical service providers.
- Transportation - Expenses for commuting to and from WIOA activities such as public transportation fare, carpool arrangement, or gas for personal auto.
- Other – Services that are consistent with these policies and when justification is maintained in the customer's file. Examples include, but are not limited to, the following: uniforms or work-related tools, including such items as eyeglasses and protective eye gear that may be needed for participating in WIOA activities and/or employment, materials for individuals with disabilities, and needs-related payments.

Follow-up services for system-exited WIOA Title I Adult and Dislocated Worker program participants can include, but are not limited to, two-way exchanges between the service provider or case manager and either the individual (or his/her advocate) or the individual's employer as follows:

- Counseling individuals about the workplace
- Contacting individuals or employers to verify employment
- Contacting individuals or employers to help secure better paying jobs, additional career planning, and counseling for the individual
- Assisting individuals and employers in resolving work-related problems
- Connecting individuals to peer support groups
- Providing individuals with information about additional educational or employment opportunities
- Providing individuals with referrals to other community services

The CLAWDB will also expand its partnership with the Los Angeles County Department of Public Social Services (DPSS) to leverage their Refugee Social Services, Targeted Assistance, and CalWORKS grants as described in the items below.

2. *The Local Plan describes the process Local Boards and their partners will use to retain this population in regional sector pathway programs as they progress into livable wage jobs and careers.*

The Local Board will coordinate with AJCC partners and CBOs to provide participants with services, based on individual assessment of needs, that include active advising, career navigation, case coordination, and referrals to specialized suppliers. The goal is to provide academic support services and wraparound services, designed specifically to retain participants in their selected career pathway, and to lessen the burden of obstacles faced by students such as English language learners and those who lack college readiness skills. This will be achieved by arranging for tutoring or other services, such as educational remediation, transportation, childcare, and textbooks and supplies. Services may also include counseling, access to role models and mentors, flexible schedules, and access to financial aid and other public benefits. After job placement, follow-up services as described in the section above will be provided to ensure job retention.

The Local Board will also coordinate with the DPSS's Refugee Employment Program (REP) to ensure refugees are co-enrolled into the REP in order to maximize supportive services available to ensure continued participation in sector pathway programs. All REP participants are eligible for supportive services in order to assist them in engaging in obtaining/retaining employment. Preventing undue hardship is critical to assisting participants in gaining self-sufficiency. REP eligible participants receive the necessary supportive services payments timely, prior to their engagement in employment-related activities.

3. The Local Plan incorporates any workforce or employment service plans developed by stakeholders (e.g. Employment Service Plans developed by County Welfare Departments etc).

Through its partnership with LAUSD, the local AJCCs incorporate DACE's "Pathways to Success" plan for English Language Learners. These pathway programs integrate language learning with career pathway training. Vocational English as a Second Language (VESL) content includes career pathways, employability skills, occupation-specific terminology and communication skills, and listening, speaking, reading and writing skills.

Local AJCCs will integrate the Employment Services Components of REP's *Refugee Social Services and Targeted Assistance Plan*. This plan provides participants who qualify as refugees numerous job search and supportive services, as well as job retention support, funded through Refugee Social Services, Targeted Assistance, and CalWORKS grants.