



Category/Subject: RecoverCO (National Employment Recovery Dislocated Worker Grant)
Colorado Policy Guidance Letter#: GRT-2020-01
<u>Revise/Replace</u> : N/A
Date: July 2, 2020
Distribution: Managers, Workforce Development Programs Staff, Local Area Directors, Fiscal

**Changes from the Comment Period Highlighted**

**I. REFERENCE(S):**

- [Workforce Innovation and Opportunity Act \(WIOA\) of 2014](#).
- [20 Code of Federal Regulations](#), specifically 20 C.F.R. parts 680 and 687.
- Training and Employment Guidance Letter [\(TEGL\) 12-19](#), National Dislocated Worker Grant Program Guidance.
- [TEGL 19-16](#), Guidance on Services Provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules.
- Policy Guidance Letter (PGL) [WIOA-2015-05](#), WIOA Title I Eligibility Guidelines, [Attach 2](#).
- PGL [WIOA-2017-11](#), WIOA Title I Supportive Services.
- PGL [WIOA-2017-02](#), Incumbent Worker Training.
- PGL [WIOA-2020-03](#), Rapid Response Policy Guidance.
- PGL [ADM-2019-07](#), Internal and Sub-Recipient Monitoring.
- [Funding Streams Desk Aid](#) for Workforce Staff.

**II. PURPOSE:**

To provide policy, information, guidelines, and programmatic requirements for Local Workforce Boards and Local Areas to implement the National Employment Recovery Dislocated Worker Grant (referred to as RecoverCO) to address the workforce-related impacts of COVID-19 and temporarily expand the service capacity of the Dislocated Worker Program.

**III. BACKGROUND:**

The U.S. Department of Labor (USDOL) awards National Dislocated Worker Grants (DWG) for Employment Recovery to respond to major economic dislocations, as appropriate, and to minimize the employment and economic impact on individuals whose jobs have been affected by the COVID-19 pandemic.

In March 2020, in response to the COVID-19 pandemic, the Governor and the Colorado Department of Public Health and Environment (CDPHE) issued a series of Executive Orders and Public Health Orders to protect state residents by limiting exposure to, and transmission

of, the COVID-19 virus. The orders resulted in statewide closures of ski resorts, bars, restaurants, gyms, theatres, casinos, non-essential personal services facilities, and schools. Subsequently, Colorado's economy has been severely affected with hundreds of thousands of Coloradans seeking unemployment insurance and assistance from the state's public workforce system.

The Colorado Department of Labor and Employment (CDLE) applied for and received Employment Recovery Grant funds totaling \$4,995,000. The RecoverCO grant is designed to provide Rapid Response, Layoff Aversion, and employment and training assistance to dislocated workers and other eligible participants. Funding will be allocated to the designated Hub Administrator, who will work with their local area hub to administer Rapid Response, Layoff Aversion and employment and training assistance for the following targeted groups: workers temporarily or permanently laid off; dislocated workers; long-term unemployed workers; incumbent workers; and self-employed individuals who are unemployed or underemployed as a result of the pandemic. The overall period of performance of the grant is April 15, 2020 – January 31, 2022, which will also be the period of performance for the Hub Administrators. The effective start date for the local areas may vary based on the execution date of their individual MOU with the Hub Administrator.

#### **IV. POLICY/ACTION:**

##### **A. Local Area Participation**

All ten local areas are participating in this grant: Adams County, Arapahoe/Douglas Works!, Boulder County, Denver County, El Paso/Teller, Tri-County, Larimer County, Mesa County, Weld County, and the Rural Consortium. Participating local areas are required to work with their Hub Administrator to perform activities which are allowable under this program. The Rural Consortium, **Pikes Peak**, and Tri-County (Jefferson County) will serve as Hub Administrators.

A Hub Administrator is a local area that coordinates grant activities on behalf of regional local area partnerships. The responsibilities of the Hub Administrator are as follows:

1. Required to establish a Memorandum of Understanding with each local area partner, which must include shared and local area specific negotiated funding and performance outcomes.
2. Required to track the progress of local area partners and work collaboratively to adjust funding and outcomes as needed to meet overall grant goals.
3. Required to communicate progress to the **RecoverCO** Coordinator and Regional Liaison.

##### **B. Participant Eligibility**

Dislocated workers (as defined under WIOA) are eligible participants in the RecoverCO grant. Generally, a dislocated worker is an unemployed individual with previous attachment to the workforce who was laid off. For a full definition of dislocated worker eligibility, see PGL WIOA-2015-05, [Attachment 2](#).

### **C. Recruitment of Participants**

Local areas should use Labor Market Information (LMI) to appropriately target outreach and services to dislocated worker populations. Coordination with Unemployment Insurance (UI) Programs is strongly encouraged to ensure that UI claimants, individuals who have exhausted UI benefits, and other dislocated workers encountering long-term unemployment are contacted regarding the services available through this program to help them find or sustain employment. Local areas are encouraged to collaborate within their designated local area hub to coordinate outreach to dislocated workers.

### **D. Program Activities**

The following program activities are allowable under the RecoverCO grant:

#### **1. Rapid Response & layoff aversion services including:**

- Informational and direct re-employment services for workers, including but not limited to, information and support for filing unemployment insurance claims, information on career services available through the Colorado workforce centers, health insurance options once employer sponsored health coverage ends, and information on the tax and unemployment insurance benefit impacts of decisions made about employer provided retirement plans and life insurance.
- Delivery of solutions to address the needs of businesses in transition provided across the business lifecycle, including comprehensive business engagement and layoff aversion strategies and activities designed to accelerate re-employment and prevent or minimize the duration of unemployment.
- Convening, brokering, and facilitating the connections, networks and partners to ensure the ability to provide assistance to dislocated workers and their families such as home heating assistance, legal aid and financial advice.
- Strategic planning, data gathering and analysis designed to anticipate, prepare for, and manage economic changes.
- Layoff aversion activities that may include but are not limited to helping workers affected by separation to achieve re-employment before their layoff date, Workshare, and incumbent worker training.

#### **2. Career Services**

WIOA Title I Career services are described in TEGL 19-16, Section C. These include services and activities to help support dislocated workers in making informed decisions based on local and regional economic demand for the purpose of achieving reemployment and education goals. These include but are not limited to: outreach, intake, labor exchange services, initial and comprehensive assessments, development of an individual employment plan, referrals, provision of labor market information, provision of information on eligible training providers, and provision of information on the availability of supportive services.

- **Work Experiences/Internships**

Work experiences/internships may be paid or unpaid, and will be primarily short term in nature; the goal of a work experience is to equip individuals with actual hands-on experience in their new career field to help build their resumes. Work experiences may be used concurrently or in conjunction with

classroom vocational training through the Community College system or other educational institution, but it is not required.

### **3. Training Services**

Training and work-based training models are a key component of RecoverCO. Training is effective in helping job seekers to quickly re-enter the workforce, learn the desired skills in the workplace, and obtain or retain employment utilizing the newly acquired skills and competencies.

Training and work-based training services will utilize existing strategies that will emphasize and link pre-vocational training and credentialing with work-based training such as work experiences, On-the-Job Training, registered and other apprenticeships, incumbent worker training, transitional jobs training, and customized or cohort training, and will utilize existing sector and career pathways strategies that target high demand occupations.

Authorized Training services are the same as formula WIOA Dislocated Worker programs and are subject to the limitations or requirements as applicable to the WIOA Dislocated Worker formula program delineated in Federal, state and local guidance. Training programs must be selected from the Eligible Training Provider List (ETPL).

### **4. Supportive Services**

Supportive services are allowable when they are needed to enable individuals to participate in employment and training services and when supportive services cannot be obtained through other programs. Supportive service policies must align with PGL [WIOA-2017-11, WIOA Title I Supportive Services](#) and local area supportive service policies; any supportive services provided must be consistent with WIOA and the purposes of this grant. Supportive services may include resources that are specific to the unique nature of the pandemic and the methods used to curtail its spread. Barriers that can be addressed with supportive services may include, but are not limited to: access to the technology required to work remotely, loss of, or decreased availability of childcare, personal protective equipment, increased costs for transportation, rental and utility assistance.

### **E. Program Enrollment and Exits**

The program code used in Connecting Colorado to track performance for the RecoverCO is **ER**. Standard activity codes used for WIOA and Wagner-Peyser activities in Connecting Colorado will also apply to this grant. Co-enrolling customers into other programs, when appropriate, is optional, but highly encouraged to leverage resources. Please see the [Funding Streams Desk Aid](#) to determine which programs are appropriate for co-enrollment with this grant.

An **Exiter** is a participant who has not received a participation service for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services. The focus of the Employment Recovery program is economic and employment recovery, with WIOA and other partner programs, including the COResponds program, leveraged to meet employment, training and supportive services needs.

**Co-enrolled Exiters:** A co-enrolled participant cannot be exited until participation has been completed for all of the programs in which the participant is enrolled. This is consistent with USDOL's requirement that – at a minimum – there be a common exit date across WIOA Title I, TAA and Employment Service programs, such as Employment Service (ES) and Wagner-Peyser (PT).

There is one exception to this rule: For National Dislocated Worker Grants, participants must be exited no later than the date the grant expires, but exits prior to the expiration date must follow the 90-day rule.

**NOTE:** If an individual is co-enrolled in the WIOA youth program and any other program, and is receiving supportive services, this service will be considered a participation service and will extend participation in all programs subject to the common exit requirement.

#### **F. Case File and Documentation Requirements**

Local areas will be required to follow standard WIOA Dislocated Worker program case file procedures and documentation requirements.

#### **G. Reporting Requirements**

Fiscal Reporting: Each month, Hub Administrators must submit expenditures and accruals to CLEAR or, in the case of the Rural Consortium, CORE, using standard fiscal reporting procedures. Local areas will be expected to report expenditures and accruals to their Hub Administrator to meet state reporting requirements.

#### Narrative Reporting:

Each local area shall submit monthly progress charts/questions and quarterly narrative reports to their Hub Administrator using the required reporting templates that will be provided by the state. The Hub Administrator shall submit these monthly progress charts/questions and quarterly narratives by the 15th of the following month to the State RecoverCO Coordinator via email, beginning August 15, 2020.

Local areas will track and document their strategic planning activities, their partner engagement, customer success stories, and additional career service and training outcomes for the purpose of analyzing sector strategy planning and outcome effectiveness. Under WIOA, regional sector strategy projects are specifically encouraged, so these additional reporting elements will be useful as the state moves towards WIOA aligned programs and goals. The submission of success and/or impact stories for both employers and customers will be a required element of the **quarterly** report.

Closeout Report: Hub Administrators must submit a project closeout report to the state within 30 days of the end of the period of performance. A narrative statement outlining the highlights, challenges, successes, customer and partner feedback should be included in the report. The report may be sent via email to the State RecoverCO Coordinator.

#### **H. Performance Requirements**

Each local area hub shall meet the same performance standards for this grant as the WIOA Dislocated Worker program.

Additionally, each local area will be required to meet the quarterly enrollment and expenditure goals established by their Hub Administrator via the hub work plan.

The reporting requirements for the RecoverCO program are designed to help the State RecoverCO Coordinator to identify technical assistance opportunities and to facilitate the review of grant activities.

Outcome	Performance Standard
Planned Employment Rate (2nd Quarter after Exit)	76.4%
Planned Employment Rate (4th Quarter after Exit)	76.9%
Planned Median Earnings	\$9,000
Planned Credential Rate	67%
Planned Measurable Skills Gains Rate	58.6%

In addition to the above performance standards for Dislocated Workers, RecoverCO will also track retention with the same employer in the 2nd and 4th quarters after exit to measure Effectiveness in Serving Employers.

#### **I. Outreach, Marketing and Promotional Guidelines, Limitations, Constraints**

All outreach activity, marketing, and promotional expenses must be allowable pursuant to OMB Federal accounting principles and applicable circulars, and shall include specific language identified in the current Workforce Development Programs (WDP) agreement funding provisions.

#### **J. Monitoring Responsibilities**

##### Internal and Sub-Contractor Monitoring and Oversight

Local areas are responsible for internal monitoring and oversight of all aspects of the grant and grant activities, including the monitoring and oversight of work-based learning contracts, participants, and related activities to ensure consistency with the provisions of applicable Federal statutes, regulations, and the terms and conditions of this grant. Local areas must follow [PGL ADM-2019-07, Internal and Sub-Recipient Monitoring](#) and local internal and sub-recipient monitoring policies and procedures.

##### Local Area Hub Oversight

All ten local areas are participating in this grant: Adams County, Arapahoe/Douglas Works!, Boulder County, Denver County, El Paso/Teller, Tri-County, Larimer County, Mesa County, Weld County, and the Rural Consortium. Participating local areas are required to work with their Hub Administrator to perform activities that are allowable under this program. The Rural Consortium, **Pikes Peak**, and Tri-County (Jefferson County) will serve as Hub Administrators.

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1. Required to establish a Memorandum of Understanding with each local area partner, which must include shared and local area specific negotiated funding and performance outcomes.
2. Required to track the progress of local area partners and work collaboratively to adjust funding and outcomes as needed to meet overall grant goals.
3. Required to communicate progress to the State Disaster Recovery Grant Coordinator and Regional Liaison.

#### State Monitoring and Oversight

Formal monitoring of grant performance **for each local area** will be conducted by the WDP monitoring staff as part of their local area annual compliance monitoring and program reviews. In addition, CDLE will review the grant's progress at the state level on an ongoing basis to ensure that the overall grant activities, deliverables, expenditures, and performance outcomes are in compliance with federal and state requirements.

#### **K. Allowable Costs**

This list is a non-exhaustive list of examples of activities that would qualify to be funded as grant-related activities:

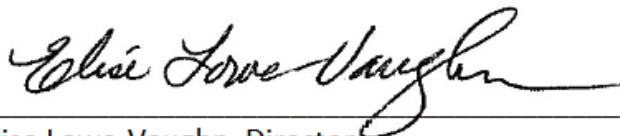
- Costs related to address the workforce-related impacts of COVID-19 and temporarily expand the service capacity of the Dislocated Worker Program.
- Staffing costs for Business Services Representatives in the local areas to work with employers affected by COVID-19 to include (but not be limited to the following): Hiring, Rehiring, Job Fairs, Layoff Aversion and Rapid Response and related activities, COVID-19 related employer concerns/activities, traditional business services, any activities related to Incumbent Worker Training.
- Staffing costs related to case management activities for job seekers enrolled in the grant and any Incumbent Worker-related training or activities to help ensure success.
- Staffing costs to have a staff member identified as grant lead or project lead.
- Strategic planning, data gathering, and analysis designed to anticipate, prepare for, and manage economic changes.
- Rapid Response and Layoff Aversion activities that may include but are not limited to, helping workers affected by separation to achieve re-employment before their layoff date, Workshare, and Incumbent Worker training.
- Delivery of solutions to address the needs of businesses in transition provided across the business lifecycle including comprehensive business engagement and layoff aversion strategies and activities designed to accelerate re-employment and prevent or minimize the duration of unemployment.
- Travel costs for staff in the local areas to attend training, visit employers, meetings, etc.
- Provide Covid-19 related support to businesses.
- Outreach, assessment, education, classroom training, pre-apprenticeship training, case management, supportive services for participants not otherwise covered or leveraged through WIOA or partner resources.

- Work-based learning activities, such as paid internships, work experience, registered apprenticeships, and On-the-Job Training (OJT), virtual and classroom training.
- Modification and expansion of existing career pathways to increase inclusivity and accessibility for persons with disabilities.
- Engage industry and sector partners, and employers to identify barriers to recruiting, hiring, training and retaining adults with disabilities, and increase awareness about workplace accommodations.
- Offer career services including recruitment, screening, vocational guidance, job referral and placement, etc
- Provide supportive services including, but not limited to, personal protective equipment, work attire, dependent care, transportation assistance, **housing assistance, utilities**, books and supplies for training, workplace accommodations, fees for applications, mileage reimbursements, cell phones and internet service if the individual works from home or in the field.

**Administrative Costs.** The Hub Administrator may retain up to 10 percent of the award amount, which can be used by all hub members. The Hub and sub-recipient local areas may determine the split that occurs among them.

**V. IMPLEMENTATION DATE:** Effective immediately.

**VI. INQUIRIES:** Please direct all inquiries to the State RecoverCO Coordinator, Lara Seiferd, at [lara.seiferd@state.co.us](mailto:lara.seiferd@state.co.us) or 303-318-8831.




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Elise Lowe-Vaughn, Director  
Workforce Development Programs

**ATTACHMENTS:**

**The Monthly Reporting Template will be added as an attachment once it is finalized.**