

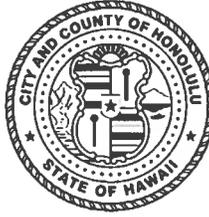
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OAHU WORKFORCE DEVELOPMENT BOARD
CITY AND COUNTY OF HONOLULU

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May 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #06-25**

SUBJECT: QUEST Participants

PURPOSE:

The purpose of this policy is to establish guidance on the provision of eligible participants in the QUEST program.

POLICY:

Internships, a form of work-experience, are a featured component of Hawaii's QUEST program. Work-experience is defined in 20 CFR § 680.180 as a planned, structured learning experience that takes place in a workplace for a limited period of time. As designed for Hawaii's QUEST program, they are all paid work-experiences. QUEST internships may be arranged within the public sector (City and County of Honolulu), private for-profit sector, and/or private non-profit sector. Counties and WDD Branches should incorporate a planned structure for internships that includes periodic evaluations and feedback from worksite supervisors and interns and a process for resolving issues identified. Individuals are considered participants when they have received a QUEST service other than self-service or information-only activities and have satisfied all applicable programmatic requirements for the provision of services, such as eligibility determination.

The City and County of Honolulu will ensure safeguards are in place so that QUEST interns (as with WIOA formula-funded work-experience)-

- Do not displace or partially displace existing employees;
- Do not impair existing contracts for services or collective bargaining agreements (and if it is inconsistent with a collective bargaining agreement,

the appropriate labor organization and employer must provide written concurrence prior to internship beginning);

- Do not perform work for the same or substantially similar job, if the employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the QUEST participant; or
- Do not infringe in any way on the promotional opportunities of currently employed workers as of the date of the participation. (Refer to 20 CFR § 683.270.
- A reasonable time scheduled to intern. All City and County of Honolulu office internships will be between the hours of 7:45 am – 4:30 pm. Private sector and all other businesses the internship will be conducted at a reasonable time for the safety of the participant and for mentoring.

Follow-Up After Participant Exit

The City and County of Honolulu will follow up on a participant after their exit from the program as an information-gathering activity that will not extend the duration of a participant's enrollment unless further services are deemed necessary. The follow up with QUEST participants will be scheduled as similarly required for WIOA formula-funded participants in order to collect supplemental wage data and determine employment status of the individual, which will help assess effectiveness of the program.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



Harrison Kuranishi
Executive Director

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May 15, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #7-25**

SUBJECT: Individual Employment Plan (IEP) and Individual Service Strategy (ISS) Policy

PURPOSE:

The purpose of this policy is to provide entities awarded a subcontract or agreement through the Oahu Workforce Development Board – WIOA funds for Title I with the guidelines and requirements for the development and implementation of Individual Employment Plan (IEP) and Individual Service Strategy (ISS) documents.

BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) requires that all Adult, Dislocated Worker, and Youth participants be provided an assessment and an Individual Employment Plan (IEP) or an Individual Service Strategy (ISS), depending on the program. The IEP and ISS are similar documents / processes; however the IEP is for Adult and Dislocated Worker Program participants while the ISS is designed for Youth Program participants. The IEP and ISS are a culmination of the assessment and needs to identify the employment goal, appropriate achievement objectives, and the appropriate mix of services. The content of the IEP/ISS is the road map and compass demonstrating the agreed upon plan of action. The IEP and ISS are also used to justify training which must be linked to occupations in demand in the local area or areas where the individual is willing to relocate.

POLICY:

A. Individual Employment Plan (IEP) – WIOA Adult / Dislocated Workers

What is the individual employment plan? The individual employment plan (IEP) is an individualized career service plan under WIOA sec. 134(c)(2)(A)(xii)(II), that is developed jointly by the participant and career planner when determined appropriate by the one-stop center or one-stop partner. The plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to

achieve the employment goals. (Source: WIOA § 680.170)

The IEP is an individualized career service for adults and dislocated workers that the participant and the case manager jointly develop. The plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve employment goals. WIOA enhances the youth program design through an increased emphasis on individual participant needs by adding new components to the objective assessment and individual service strategy. WIOA incorporates career pathways as part of the ISS's objective assessment and development. In addition, the ISS must be directly linked to one or more performance indicators.

An IEP will cause an individual to be considered a participant; however, there are other ways to qualify for participation because there is no sequence of services requirement in WIOA.

An IEP is an individualized career service that can be provided under either Title I of WIOA or the Wagner-Peyser Act Employment Service (ES) (as amended by Title III of WIOA).

WIOA authorizes "career services" for adults and dislocated workers rather than "core" and "intensive" services, as authorized by WIOA. There are three types of "career services": basic career services, individualized career services, and follow-up services. These services can be provided in any order; there is no sequence requirement. Career services under this approach provide local areas and service providers the flexibility to target services to the customer's needs.

The three categories of career services are defined as follows:

Basic Career Services

Basic career services must be made available to all individuals seeking services served in the one-stop delivery system, and include:

- Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs;
- Outreach, intake (including identification through the state's Worker Profiling and Reemployment Services system of unemployment insurance (UI) claimants likely to exhaust benefits), and orientation to information and other services available through the one-stop delivery system;
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs;
- Labor exchange services, including—
 - I. Job search and placement assistance, and, when needed by an individual, career counseling, including—
 - II. Provision of information on in-demand industry sectors and occupations (as defined in sec. 3(23) of WIOA); and,
 - III. Provision of information on nontraditional employment (as defined in sec. 3(37) of WIOA);
- Provision of referrals to and coordination of activities with other programs and services, including those within the one-stop delivery system and, when appropriate, other workforce development programs;
- Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including—
- Job vacancy listings in labor market areas;

- Information on job skills necessary to obtain the vacant jobs listed; and
- Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs;
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers;
- Provision of information about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system;
- Provision of information relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including:
 - I. Child care;
 - II. child support;
 - III. medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program;
 - IV. benefits under the Supplemental Nutrition Assistance Program (SNAP);
 - V. assistance through the earned income tax credit; housing counseling and assistance services sponsored through the U.S. Department of Housing and Urban Development (HUD);
 - VI. and assistance under a State program for Temporary Assistance for Needy Families (TANF),
 - VII. and other supportive services and transportation provided through that program;

Individualized Career Services

If one-stop center staff determine that individualized career services are appropriate for an individual to obtain or retain employment, these services must be made available to the individual. These services must be available in all one-stop centers. One-stop center staff may use recent previous assessments by partner programs to determine if individualized career services would be appropriate. These services include:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include—
- Diagnostic testing and use of other assessment tools; and
- In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, eligible training providers;
- Group and/or individual counseling and mentoring;
- Career planning (e.g. case management);
- Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training, in some instances pre-apprenticeship programs may be considered as short-term prevocational services;
- Internships and work experiences that are linked to careers;

- Workforce preparation activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, or training, or employment;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance; and
- English language acquisition and integrated education and training programs.

Follow Up Services

Follow-up services must be provided as appropriate for participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Counseling about the work place is an appropriate type of follow-up service. Follow-up services do not extend the date of exit in performance reporting.

Additional Information Regarding the IEP

The IEP is an individual plan based on the information provided by the assessment. It serves as the basis for the entire case management strategy, and identifies:

1. Employment goals (s), including non-traditional employment goals;
2. Job readiness, specific strengths, and identified deficiencies;
3. Appropriate achievement objectives;
4. Appropriate services based on assessment'
5. Assessment of individual's financial, social and / or supportive needs; and,
6. Sequence and mix of services to be provided.

The IEP will also document the services provided to the individual. If changes in the employment goals and / or services occur, the IEP must be revised.

Any information that describes an individual's medical condition or disability must be maintained in a separate file consistent with policies and procedures and reference made to the separate file.

Local labor market information must be taken into consideration in the development of the IEP. It is the WIOA Program Manager's responsibility to establish processes to review and approve all registration paperwork, including the IEP, for completeness, accuracy and internal consistency as well as to ensure that the plan in each participant's file is current at all times.

B. Individual Service Strategy (ISS) – Youth

The WIOA Youth program requires every youth participant to have an ISS. WIOA calls for customer-focused services based on the individual participant's needs, not on the time constraints or structure of the provider. This includes the creation of career pathways for youth in all Title I youth programs, including a connection to career pathways as part of a youth's service strategy (ISS) in the youth formula-funded program. The ISS must directly link to one or more of the performance indicators. WIOA also calls for participants to be intimately involved in designing and implementing services so the youth's voice is represented and their needs are met.

The ISS represents an individual plan for each young person that includes:

1. Educational goal (s) of the participant;
2. Employment goal(s) of the participant, including, when appropriate, non-

traditional employment goals;

3. Objective assessment of current academic and skills levels, basic and occupational skills, prior work experience, employability, interests and aptitudes, supportive service needs, and developmental needs;
4. A “Roadmap” to achieve measurable and attainable short-term and long-term goals.
5. Appropriate achievement objectives for the participant;
6. Appropriate services, the sequence and mix of the services, and justification for the services to be provided;
7. Any referral(s) to other services / programs;
8. Services needed, but not available in the Local Area; and,
9. Assessment of the individual’s financial, social and / or supportive service’s needs.
10. Develop, and update as needed, an individual service strategy based on the needs of each youth participant that is directly linked to one or more indicators of performance described in WIOA sec. 116(b)(2)(A)(ii), that identifies career pathways that include education and employment goals, that considers career planning and the results of the objective assessment and that prescribes achievement objectives and services for the participant.

The ISS is a distinct plan designed specifically for the WIOA Youth Program participants and is based on the information obtained during the objective assessment. The ISS will serve as the basis for the entire case management service strategy and as a guide for delivery of appropriate services. The ISS will identify and document a youth’s progress, activities completed, benchmarks reached, and any other accomplishments.

Additionally, the ISS shall be:

- developed in partnership with the youth;
- used as a tool that can and will change over time, as necessary, to meet the needs of the young person;
- used as a roadmap to achieve measurable and attainable short-term and long-term goals; and
- designed to reflect the young person’s interests and incorporate career pathway planning.

The design framework services of local youth programs must:

Provide for an objective assessment of each youth participant that meets the requirements of WIOA sec. 129(c)(1)(A), and includes a review of the academic and occupational skill levels, as well as the service needs and strengths, of each youth to identify appropriate services and career pathways for participants and inform the individual service strategy.

Develop and update as needed an individual service strategy based on the needs of each youth participant that is directly linked to one or more indicators of performance described in WIOA sec. 116(b)(2)(A)(ii), that identifies career pathways that include education and employment goals, considers career planning and the results of the objective assessment, and prescribes achievement objectives and services for the participant.

Youth PROGRAM REQUIREMENTS - Core Requirements

The 14 program elements under WIOA

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies: includes instruction and evidence-based dropout prevention and recovery strategies that lead to completion of HS diploma or equivalent (including a recognized certificate of attendance or similar document for youth with disabilities) or preparation for post-secondary credentials.
2. Alternative secondary school services or dropout recovery services includes referral to formal alternative education programs or formal dropout recovery services, as appropriate
3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experiences, which may include the following types of work experiences: are planned, structured, learning experiences that take place in a workplace for a limited period of time. They may be paid or unpaid and may occur in for-profit, non-profit or public sectors. As with all workplace relationships labor standards and laws apply. Work experience provide youth with an opportunity to explore careers and develop skills. Work Experience must include a combination of academic and occupational education components. Work Experiences include the following types of experiences:
 - Summer Work Experiences
 - Pre-Apprenticeship is a program, or set of strategies, designed to prepare individuals to enter and succeed in a registered apprenticeship program; a documented partnership with at least one or more registered apprenticeship programs must be in place. Providers offering occupational education for pre-apprenticeship must be on the Eligible Training Provider List.
 - Internships & Job Shadowing are activities that provide the youth with an opportunity to explore an occupation or work environment and may include activities that allow them to gain employment and occupational skill competencies.
 - On-the-Job Training is training provided by an employer to a paid participant who is engaged in productive work from which she/he gains the knowledge and skills essential to the full performance of the job and for which the employer is provided a reimbursement of up to 50% of the participant wage and for which the employer makes a commitment to hire the individual. Summer employment opportunities and other employment opportunities available throughout the school year;
4. Occupational skills training which include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with state and local in-demand industry sectors or occupations in the local area is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required of certain occupational fields at the entry, intermediate and advanced skill levels. Priority must be given for training that leads to recognized post-

- secondary credentials that are in in-demand industry sectors or occupations in the local area.
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster refers to the integrated education and training model in which required education and training occur concurrently and contextually with workforce preparation activities and workforce training. Such a program element must describe how workforce preparation activities, basic academic skills, and hands-on occupational skills are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.
 6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors are opportunities that encourage responsibility, confidence, employability, self-determination and other positive social behaviors, such as: a) exposure to post-secondary educational possibilities, b) community and service-learning projects, c) peer-centered activities, including peer mentoring or peer tutoring, d) organizational and team work training, including team leadership training, e) training in decision-making, including prioritization and problem solving, f) citizenship training, including life skills such as parenting and work behavior training, g) civic engagement activities which promote the quality of life in a community, and h) activities that place the youth in a leadership role such as serving on a youth leadership committee or a Standing Youth Committee.
 7. Supportive Services for youth are those that are designed to enable them to participate in WIOA activities and may include: linkage to community services; referrals to health care; and cost assistance with: transportation, childcare, housing, uniforms, work attire, work-related tools, protective gear, educational testing, and reasonable accommodations for youth with disabilities.
 8. Adult mentoring is a formal, in-person, relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support and encouragement to develop the competence and character of the mentee. The activity must last for a period of at least 12 months and must be with an adult mentor other than the assigned youth case manager. Adult mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company who acts as a mentor.
 9. Follow-up services are critical services that must be provided for at least a 12 month period following the youths exit from the program and are designed to help ensure that the youth is successful in employment or postsecondary education/training. Follow-up services may include: leadership activities, regular contact with the youth's employer to help address work-related issues, assistance with career pathway development or in securing a better paying

job, assistance with further education or training and participation in work-related peer support groups, adult mentoring or other services determined appropriate based on the needs of the participant. Follow-up must include more than only an attempted contact and must be documented in order to receive a performance outcome.

- Follow-up services may be provided beyond the 12 months at OWDB's discretion. The types of services provided and the duration of services must be determined based on the needs of the youth and the type and intensity of follow-up services may differ for each participant. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.

10. Comprehensive guidance and counseling is individualized to the participant, may include career and academic counseling, drug and alcohol abuse counseling, mental health counseling and referral to partner programs for which the youth counselor has coordinated the youth referral with the partner agency on behalf of the individual youth.
11. Financial literacy education. is education or activities that: assist youth to initiate checking and savings accounts at banks and to make informed financial decisions; supports youth learning how to manage spending, credit, and debt, including student loans, consumer credit and credit cards; teaches the significance of credit reports and credit scores and rights regarding credit and financial information; teaches how to assure accuracy of a credit report and how to correct inaccuracies, and how to maintain or improve good credit; supports a participant's ability to understand, evaluate, and compare financial products and services; informs participants about identity theft, their rights in regard to it and ways they can protect themselves from it; and supports the financial literacy needs of non-English speakers through use of multilingual financial literacy and education materials.
12. Entrepreneurial skills training is training that provides the basics of starting and operating a small business, this training must develop the skills associated with entrepreneurship, such as: taking initiative, creatively seeking out and identifying business opportunities, developing budgets and forecasting resource needs, understanding various options for acquiring capital and the trade-offs associated with each option, and how to communicate effectively and market oneself and one's ideas. Approaches to teaching youth these skills may include: educational programs that introduce youth to the basics of starting and running a business; enterprise development supports and services that incubate and help the youth develop their own business through access to small loans or grants, or that provide individualized assistance in development of viable business ideas; and may include experiential programs in which youth get experience in the day-to-day operation of a business and more.

13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
 14. Activities that help youth prepare for and transition to postsecondary education and training. Include information about and preparation for college entrance including information about applying to colleges, financial aid, entrance testing, student life, pre-requisite courses and more.
- The ISS shall be a living document, to be reviewed and updated on an ongoing basis. The case manager should use the ISS to update strategies and activities as they occur and/or as life changes require, and to document referral and contact information for services obtained from partner organizations. When reviewing the ISS, case managers shall document a participant's progress, activities completed, benchmarks reached, and any other accomplishments. Additionally, the ISS shall be developed, and modified in partnership with the participant, and shall document achievements in measurable and attainable short-term and long-term goals that both reflect the young person's interests and incorporate career pathway planning.
 - Appropriate credentials to be obtained shall be included in the participant's ISS. As stated above, the participant's progress and achievements must be updated in the ISS and case notes, as appropriate.
 - While there is no minimum or maximum time a youth can participate in the WIOA youth program, programs must link program participation to a participant's ISS and not the timing of youth service provider contracts or PYs.
 - The IEP and ISS and case notes shall be used as the basic instrument to record the results of decisions made about the combination and sequence of services for the participant based on the assessment. It shall also contain a post-employment strategy given the nature of most WIOA performance measures.
 - The IEP and ISS do not give legal or entitlement rights for services to participants.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



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May 24, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #09-25**

SUBJECT: FOOD AS A SUPPORTIVE SERVICE IN THE WIOA YOUTH PROGRAM

PURPOSE:

The purpose of this policy is to provide guidance on the criteria for food as a supportive service in the Workforce Innovation and Opportunity Act (WIOA) Youth program.

BACKGROUND:

Training and Employment Guidance Letter 09-22 (TEGL 09-22) states that on a limited basis and in certain situations, food, at a reasonable cost, may be provided to WIOA Youth program participants as a supportive service. Food may be provided to WIOA youth participants when it will assist or enable the participant to participate in youth program activities and to reach their employment and training goals, thereby achieving the program's overall performance goals.

POLICY:

On a limited basis and in certain situations, food at a reasonable cost may be provided to youth-serving program participants as a supportive service. Food may be provided to eligible youth when it will assist or enable the participant to participate in allowable youth program activities and to reach his/her employment and training goals, thereby achieving the program's overall performance goals. The use of grant funds for food should be limited to reasonable and necessary purchases that are coordinated, when possible, with other community, state, or federal services that provide food for low-income individuals. All food supportive services must be documented in HireNet Hawaii.

GUIDELINES:

All food related expenditures must:

Food may be considered an allowable supportive service when:

- Program activities occur during a standard mealtime (e.g., 11:00 AM–1:00 PM)
- Youth are engaged in program services for more than 3 consecutive hours;
- Participation in events such as training, orientations, job readiness workshops, work-based learning, or career exploration activities requires nourishment to maintain engagement and retention;
- The provision of food reduces barriers to participation for youth who may be experiencing food insecurity.
- Program staff should make reasonable efforts to accommodate dietary restrictions, including allergies and cultural or religious dietary practices. This may include offering alternative food options or clearly labeling food items.
- Directly benefit WIOA Youth participants;
- Be pre-approved through proper internal procedures;
- Be supported by documentation

Food must not be provided solely for convenience, staff meetings, or general office events

1. Cost Limitations:

- All food purchases must be equated to a per-participant cost.
- Daily student cost for food cannot exceed \$15

2. Frequency:

The provision of food must be time-limited and justified based on the nature and duration of the program activity. Food should not be provided on a recurring or daily basis unless it is part of a structured, approved program design that addresses a specific participant need (e.g., a six-week work readiness academy with daily sessions that include lunch as part of the service delivery plan).

3. Required Documentation:

All food expenses charged to the WIOA Youth grant must be supported by the following documentation:

- Original itemized receipts or invoices for all purchases;
- Sign-in sheets listing all participants who received food; including date, name, cost per participant, and supervisor approval
- Event agendas or service plans showing the date, time, and duration of the activity;
- Approval forms or pre-authorization (as required by internal fiscal procedures);
- Justification memo,

All documentation must be retained in accordance with records retention schedule and available upon request for monitoring or audit reviews.

1. Expense Submission:

- Provide completed sign-in sheet and receipts for all participant food purchased during the training activity within 30 days.

- Ensure that the items submitted for reimbursement are clearly specified.
- Reimbursement requests must include proper documentation.
- Must be necessary, reasonable, allocable

Staff Training and Oversight:

- All staff involved in administering, authorizing, or overseeing youth program costs must be trained on this policy annually.
- Monitoring will include a review of food-related expenses to ensure compliance with this policy.

Non-Compliance:

Improper use of WIOA funds for unallowable food costs may result in disallowed costs and required repayment. Continued non-compliance may lead to corrective action or contract modification

Definitions:

Agenda: A program schedule outlining the structure and duration of services or events provided to WIOA participants.

Allowable Cost: A cost that is permissible under federal regulations (2 CFR Part 200 – Uniform Guidance), WIOA program rules, and OWDB policies. The cost must be necessary, reasonable, allocable, and properly documented.

Documentation: Records (digital or physical) that validate the need for and use of program funds, such as receipts, sign-in sheets, agendas, and approval forms.

Food and Refreshments: Items intended for immediate consumption such as meals, snacks, and non-alcoholic beverages. This does not include grocery items intended for later use or meals provided for staff-only events.

Meal Period: A defined window of time generally recognized as a typical mealtime (e.g., lunch from 11:00 AM–1:00 PM). Activities occurring during these hours may justify the provision of food if they exceed 3 hours or interfere with access to meals.

Necessary Cost: A cost that is essential to the delivery of WIOA Youth services and directly contributes to the achievement of program goals and participant outcomes.

Participant: An individual who has been determined eligible and enrolled in WIOA Title Youth services and is receiving program services beyond initial intake and eligibility determination.

Pre-Approval: Formal authorization required before incurring a food-related expense. This may involve submission of a justification and cost estimate to program management or fiscal staff.

Program Activity: Any structured service, training, workshop, orientation, or event provided as part of a participant's WIOA Youth service plan, including but not limited to work-readiness training, job search assistance, GED prep, career exploration, or work-based learning.

Reasonable Cost: A cost that does not exceed what a prudent person would pay under similar circumstances and is consistent with the market value of the goods or services received.

Sign-in Sheet: A dated record listing names of participants who attended a program activity where food was provided. Used to verify attendance and support cost allocation.

Subrecipient: An entity that receives WIOA funds from OWDB to carry out part of the grant-funded program. Subrecipients are responsible for following applicable WIOA regulations, Uniform Guidance, and OWDB policies.

Supportive Services: Services provided to eligible WIOA participants that are necessary to enable participation in program activities. Supportive services may include transportation, childcare, housing assistance, and food under allowable circumstances.

Uniform Guidance (2 CFR Part 200): A set of federal regulations that govern the use of federal grant funds, including cost principles, administrative requirements, and audit requirements. All WIOA-funded expenditures must comply with the Uniform Guidance.

WIOA (Workforce Innovation and Opportunity Act): A federal law designed to help job seekers access employment, education, training, and supportive services. WIOA Title I specifically addresses services to youth, adults, and dislocated workers.

REFERENCES:

- WIOA Tip Sheet Food as a Supportive Service in the WIOA Youth Program
- TEGL 09-22
- Uniform Guidance 2 CFR 200.403

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov

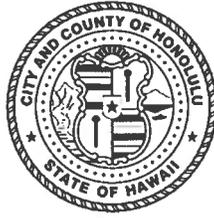


Harrison Kuranishi
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CITY AND COUNTY OF HONOLULU

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May 24, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #10-25**

SUBJECT: YOUTH ADDITIONAL ASSISTANCE CRITERION

PURPOSE:

The purpose of this policy is to provide guidance on the criteria for youth qualifying for program services through the “requires additional assistance” eligibility category. Specific guidelines and requirements are left to local workforce boards to determine what qualifies as a need for additional assistance. This allows youth to be eligible based on their need for increased support to achieve their educational and career goals.

BACKGROUND:

WIOA regulations require individuals served under the youth programs to be between the ages of 14 and 24 and face at least one barrier to employment as defined. 20 CFR 681.310 allows local areas to establish a definition for “needs additional assistance” youth program eligibility criteria for:

1. An In-school youth (ISY) who requires additional assistance to complete an educational program or to secure and hold employment; and
2. An Out-of-school youth (OSY) who requires additional assistance to enter or complete an educational program or to secure or hold employment. WIOA Youth service providers should only use this barrier if none of the other WIOA recognized barriers apply to individual youth.

POLICY:

Youth who do not meet the eligibility for Categories 1-6 for In-School Youth, and Categories 1-7 for Out-of-School Youth can be qualified for program participation through requiring additional assistance.

In-School Youth

Youth who are attending school, per definition, can be eligible for program participation if they require additional assistance to complete an educational program, or to secure or hold

employment.

Out-of-School Youth

Youth who are not attending school, per definition, and are low-income based on WIOA criteria, can be eligible for program participation if they require additional assistance to complete an educational program, or to secure or hold employment.

OWDB defines a youth who “requires additional assistance to enter and/or complete an educational program or secure and hold employment as a youth who:

- Has missed 20 or more days of school in the most recent academic year
- has less than six consecutive months experience in any one unsubsidized, full time paid employment,
- is suffering from alcohol or substance use disorders or medical issues, that interfere with school attendance
- resides in a household with, or is a victim of, domestic violence or sexual abuse
- is an expectant father,
- is the child of an incarcerated parent. Note that the specific needs additional assistance characteristics are different than WIOA Youth Program eligibility barriers and needs additional assistance criteria are limited to 5% of newly enrolled ISY in each program year.
- Has had three or more interviews without being hired in past 60 days
- Has lost employment placement in past 30 days
- More than four credits behind on diploma
- Has left education program because of transportation or financial situation

REFERENCES:

- WIOA 129(a), 20 CFR 681.200 – 681.320,
- TEGL #21-16, TEGL #19-2, TEGL #23-14, TEGL 08-15
- Workforce Innovation and Opportunity Act of 2014

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

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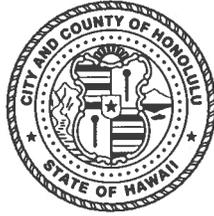


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May 24, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #11-25**

SUBJECT: ADULT MENTORING

PURPOSE:

The purpose of this policy is to provide guidance on the criteria for Adult Mentoring in the WIOA Youth Program

BACKGROUND:

Mentoring is one of the 14 program elements for the WIOA youth program. Mentoring is a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee.

POLICY:

Adult mentoring is arranged by the WIOA Youth Program service provider Employment/Education specialist. Agreements for adult mentoring will be established for participants on a work experience through the work experience agreement. For mentors beyond those in the worksite, individual agreements will be established with the specific provider to ensure the Adult Mentoring service is being provided. Mentors are not paid positions.

Adult mentoring for youth must:

- Last at least 12 months and may take place both during the program and following exit from the program;
- Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and
- While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the

youth with an individual mentor with whom the youth interacts with on a face-to-face basis.

- Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.
- Adult mentors may be the case manager.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

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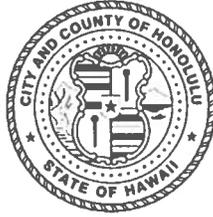


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June 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #13-25**

SUBJECT: MEASURABLE SKILLS GAIN

PURPOSE:

The purpose of this policy is to establish guidance and define Measurable Skills Gain.

BACKGROUND:

Measurable Skill Gains are used to track progress when any WIOA participant is enrolled into education or training programs that lead to a recognized postsecondary credential or employment.

DEFINITIONS

- Measurable Skills Gain – Documented and measurable academic, technical, occupational, or other forms of progress towards an industry recognized postsecondary credential or employment.

There are five types of skills gains.

- Educational Functioning Level Gain
- Secondary Diploma or Equivalency
- Secondary or Post-Secondary Transcript
- Progress Towards Milestone
- Skills Progression

POLICY:

The measurable skill gains indicator is the percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other

forms of progress, towards such a credential or employment (20 CFR § 677.155(a)(1)(v)).

The measurable skill gains indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs and can help fulfill the vision for a workforce system that serves a diverse set of individuals with a range of services tailored to individual needs and goals.

Depending upon the type of education or training program in which a participant is enrolled, documented progress is defined as one of the following. Please note that the first three gain types typically apply to participants in education, while gain types four and five typically apply to participants in training.

1. Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;
2. Documented attainment of a secondary school diploma or its recognized equivalent;
3. Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards;
4. Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training; or
5. Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams.

Documenting Progress for Types of Measurable Skill Gains

1. **Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary level** – Programs may measure educational functioning level gain in one of four ways:
 - a. Compare the participant's initial educational functioning level, as measured by a pre-test, with the participant's educational functioning level, as measured by a post-test;
 - b. Adult high school programs that lead to a secondary school diploma or its recognized equivalent may measure and report educational gain through the awarding of credits or similar;
 - c. Educational functioning level gain for participants who are enrolled in a program below the postsecondary level and who enroll in State recognized postsecondary education or training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program; or
 - d. Educational functioning level gain for participants who pass a subtest on a State-recognized high school equivalency examination.

2. **Documented attainment of a secondary school diploma or its recognized equivalent**
– Programs may document attainment of a secondary school diploma or its recognized equivalent if the participant obtains certification of attaining passing scores on all parts of a State-recognized high school equivalency test, or the participant obtains a diploma or State-recognized equivalent documenting satisfactory completion of secondary studies or an alternate diploma, including a high school or adult secondary school diploma.
3. **Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit’s academic standards**
– For secondary education, this gain may be documented through receipt of a secondary transcript or report card for one semester showing that the participant is achieving the State unit’s policies for academic standards. For postsecondary education, this gain must demonstrate a sufficient number of credit hours—which is at least 12 hours per semester (or equivalent) or, for part-time students, a total of at least 12 hours over the course of two completed semesters (or equivalent) during a 12-month period that shows a participant is achieving the State unit’s academic standards (or the equivalent for other than credit hour programs). For example, if a postsecondary student completed 6 hours in the spring semester and 6 more hours in the fall semester and those semesters crossed two program years, they would not count as a skill gain in the first program year, but they would count as a skill gain in the second program year.
4. **Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training**
– Documentation for this gain may vary, as programs should identify appropriate methodologies based upon the nature of services being provided, but progress reports must document substantive skill development that the participant has achieved. The gain may be documented by a satisfactory or better progress report from an employer or training provider. Progress reports may include training reports on milestones completed as the individual masters the required job skills, or steps to complete an OJT or apprenticeship program. Increases in pay resulting from newly acquired skills or increased performance also can be used to document progress. Milestones should be established in advance of the education or training program, or in advance of the program year being measured, to be considered an “established milestone.”
5. **Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams** – Documentation for this gain may include passage of a component exam in a Registered Apprenticeship program, employer-required knowledge-based exam, satisfactory attainment of an element on an industry or occupational competency-based assessment, or other completion test necessary to obtain a credential.

PROCEDURE:

All WIOA funded, contracted service providers will be expected to follow this system to track and record Measurable Skill Gain attainments for their WIOA participants who are enrolled into any of the following training activities but not limited to:

Adult and Dislocated Workers:

- Occupational Skills Training
- On-the-Job Training
- Customized Training
- Skills Upgrade and Retraining
- Pre-Apprenticeship with Occupational Skills Training
- Private Sector Training
- Job Readiness Training
- Workplace Training
- Adult Education with Training
- Apprenticeship
- Occupational Skills Training

Youth:

- Alternative Secondary Education
- Occupational Skills Training
- Adult Education (GED)
- Post-Secondary Education
- Entrepreneurial Skills Training
- Secondary Education
- Youth Occupational Skills Training
- Apprenticeship
- Pre-Apprenticeship with Occupational Skills Training
- Occupational Skills Training Non-WIOA

All participants who achieve a credential outcome are expected to have at least one documented MSG. Staff must document all applicable MSGs achieved by participants enrolled in education and training services. Case notes and appropriate documentation must be maintained in HireNetHawaii to support all MSG achievements.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



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June 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #14-25**

SUBJECT: CREDENTIALS

PURPOSE:

The purpose of this policy is to establish guidance and define Credentials.

BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) has put into place a Credential Attainment indicator for Title I, programs. Credential Attainment is the percentage of those clients enrolled in an education or training program (excluding OJT and Customized Training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.

DEFINITIONS

- **Recognized Credentials** - A recognized postsecondary credential is defined as an industry-recognized certificate or certification, a certificate of apprenticeship completion, a license acknowledged by the State or Federal government, or an associate, Bachelor's, or graduate degree. This includes graduate degrees for the purposes of the Vocational Rehabilitation program, as outlined in the Rehabilitation Act of 1973 section 103(a)(5) and (18). A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

POLICY:

All training services must be clearly identified and expectations for earning of a credential must be stated in the client's Individual Service Strategy, Individual Employment Plan, or

Individualized Plan for Employment. The client must understand that once training begins, he or she is expected to complete all requirements and program personnel must not report a credential if the client failed to complete the entire program.

Credential Attainment is the percentage of participants enrolled in an education or training program (excluding on-the-job training and customized training) who attain a recognized postsecondary credential or secondary school diploma or equivalent during participation in, or within one year of, exit from the program.

Youth participants who have attained a secondary school diploma or its recognized equivalent are included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant also is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

For each core program, a description of who qualifies as being enrolled in an education or training program' and is thus included in the credential attainment indicator includes:

- TITLE I ADULT AND DISLOCATED WORKER: All participants in the Adult and Dislocated Worker programs who are enrolled in an education or training program (excluding those in On-the-Job Training or Customized Training) are counted in the credential attainment indicator.
- TITLE I YOUTH:
 - In-school Youth (ISY): All ISY are included in the credential attainment indicator because they are attending secondary or postsecondary school.
 - Out-of-school Youth (OSY): Only OSY who participate in one of the following are included in the credential attainment indicator:
 - Occupational Skills Training (OST)
 - Secondary (high school) education at or above the 9th-grade level during participation
 - Postsecondary education during participation
 - Title II Adult Education and Literacy (AEL) programs at or above the 9th-grade level
 - YouthBuild programs during participation o Job Corps programs during participation

Credential: This indicator measures attainment of two types of credentials:

1. Recognized Postsecondary Credentials are defined as a credential consisting of:

- Industry-recognized certificate or certification; Employment and Training Administration's (ETA) Office of Apprenticeship or recognized State apprenticeship agency;
- Certificate of completion of an apprenticeship;
- License recognized by the State or Federal government;
- Associate or baccalaureate degree.

A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are

based on standards developed or endorsed by businesses or industry associations.

Examples:

- Certified Nursing Assistant (CNA) License
 - Occupational License
- Automotive Service Excellence (ASE) Certification
 - Example of Occupational Certificate
- Certificate of Completion of a Registered Apprenticeship Program
 - Example of Occupational Certificate
- Associates of Applied Science Degree in Diesel Technology
 - Example of Associates Degree
- National Institute for Metalworking Skills (NIMS) Certification
 - Example of Occupational Certificate
- Massage or Cosmetology License
 - Example of Occupational License

2. **Secondary school diploma or its recognized equivalent**

- **Secondary School Diploma:** An official certificate awarded for completing required coursework and credits at a high school or equivalent institution, showing proficiency in core subjects like math, language arts, and social studies.
- **Secondary School Equivalency Diploma:** A certificate awarded for demonstrating knowledge and skills equivalent to a high school diploma, usually through passing a standardized test like the GED (General Educational Development).
- **Associate's Degree:** An academic degree awarded after completing a two-year program at a community or technical college, covering specific study areas or general education and serving as a basis for further education or workforce entry.
- **Bachelor's Degree:** An academic degree awarded after a four-year undergraduate program, covering a specific major and general education. It's often required for professional positions and can lead to advanced studies.
- **Occupational Licensure:** A certification from a government or regulatory body that authorizes individuals to work in a specific occupation, requiring specific education, experience, and exams to ensure they have the necessary skills.
- **Occupational Certificate:** A credential awarded for completing specific training or education in an occupation, verifying the necessary skills and knowledge. It is typically issued by educational institutions, professional organizations, or industry associations.
- **Occupational Certification:** A credential given to individuals who prove their competency in a specific occupation by passing an exam and meeting other criteria, validating their skills and knowledge.
- **Other Recognized Certificates:** Industry/occupational skills completion are sufficient to qualify for entry-level or advancement in employment.

CERTIFICATES VS CERTIFICATIONS

- **Certificates** are formal documents that validate the completion of a course or training, demonstrating acquired skills or knowledge in a specific area.

- Certificates must recognize technology or industry/occupational skills for the specific 2 industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills 3 certificates are broadly required to qualify for entry-level employment or advancement in employment.
- **Certifications** are official credentials that validate expertise and competency in a profession or skill, awarded after meeting specific standards, often through exams or training.

CREDENTIAL DOCUMENTATION

Acceptable documentation includes:

- Data Crossmatch
- Copy of credential (e.g., a certificate from obtaining a license or degree)
- Copy of school record (e.g., year-end transcripts)
- Signed follow-up survey (letter) from program participant
- Case notes documenting information obtained from education or training provider (letter or email from education or training provider must be uploaded in HireNetHawaii)

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

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June 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #15-25**

SUBJECT: BOARD MEMBERS CONFLICT OF INTEREST

PURPOSE:

To ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds. This policy is established to provide direction for subrecipients, contractors, staff and board members of the Oahu Workforce Development Board in order that business can be conducted within guidelines that will prevent actual, potential, or questionable conflicts of interest.

POLICY:

The WIOA Program is not an entitlement program. Still, it should be accessible to any individual who is eligible and suitable for available services subject to policies and procedures. However, when applicants have a close relationship with WIOA staff members, management, and other stakeholders in the Workforce Development System, access to program services should not be based on such relationships or based on political influence. It is possible that, even without any intention to misuse WIOA funds, that a decision to enroll an individual in the program could be perceived as improper. Such a perception could cause noncompliance with state and/or federal law.

The Oahu Workforce Development Board, Board staff and the City and County of Honolulu must help meet the objectives of WIOA through effective policies, procedures, and safeguards that ensure the integrity of these public funds. Throughout the City and County of Honolulu, safeguards must be in place, ensuring that all those served in the program are not only eligible and suitable but also detached from being part of the perception of impropriety or conflict of interest.

A local member may not cast votes or participate in any decision making about providing services by such member (or by any organization which that member directly represents). A local member may not cast votes or participate in any decision making on any matter that would provide any direct financial benefit to that member or to that member's organization.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

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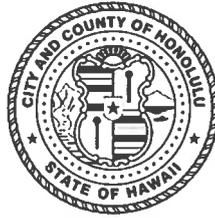


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June 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #16-25**

SUBJECT: CHANGE OF SERVICE PROVIDER

PURPOSE:

To establish the Oahu Workforce Development Board (OWDB) policy and guidance concerning change of service provider and transferring of program participant files between providers of Workforce Innovation and Opportunity Act (WIOA) Title I services and to govern the actions taken in the event of a significant interruption or complete cessation of federal funding for programs authorized under Title I of the Workforce Innovation and Opportunity Act (WIOA). This policy serves as the official contingency plan for such events, establishing procedures for an orderly and responsible response.

BACKGROUND:

OWDB has established that for Federal, State, and local record retention requirements, all financial, statistical, property, applicant, and program participant records and supporting documentation must be retained by the provider of WIOA Title I services for a period of at least three (3) years after the date of submission of final grant expenditure report/ close-out package. If any litigation, claim, or audit is initiated before the expiration of the three years, the records must be retained until all litigation, claims, or audit findings involving such records have been resolved and final action has been taken. This requirement is consistent with Federally established uniform administrative requirements.

POLICY:

OWDB has established standards to provide a uniform approach for the transferring of participant files among providers of WIOA Title I services. Sub-recipients shall follow this policy and may establish written procedures that meet the requirements of this policy.

Confidentiality and Security of Program Participant Information

As part of their program activities, service providers may possess large quantities of Personally Identifiable Information (PII) related to their organization and individual program participants. This information is generally found in program participant data sets, performance reports, and

other sources.

WIOA and its associated regulations require that all applicant and program participant personal information is, and remains, confidential. Appropriate efforts must be taken to protect the confidentiality of personal information that is attributable to any specific individual (e.g., address, Social Security number, telephone number, etc.). It is the policy of WC to ensure that program participants' personal information is collected, used, and stored in a manner that prevents unauthorized personnel from accessing it.

WC is committed to protecting the confidentiality of all WIOA Title I applicants and program participants by enforcing processes that mitigate the risks associated with the collection, storage, and dissemination of program participant data, including PII.

- I. By law, the Oahu Workforce Development Board and its providers of WIOA Title I services are required to maintain and retain records of all programmatic and fiscal activities funded in whole or in part under Title I of WIOA. All information required by Federal, State, and local reporting requirements must be collected for each individual receiving services. The appropriateness of any service provided to an eligible participant must be documented in a timely and accurate manner in OWDB PIRL, and supporting documentation must be maintained in the program participant files.

II. Change of Service Provider - Participant Request

- A. At any time, a program participant may request for their case to be transferred to another provider of WIOA Title I services within the AJC. This request may be a result of personal needs and/or circumstances that will facilitate the program participant's active participation in the WIOA Title I-funded program to accomplish established employment goals and/or objectives.
- B. Typically, there are three circumstances which may start the transfer of program participants from one provider of WIOA Title I services to another:
 - Program participant request for transfer; or
 - Transfer initiated by OWDB to ensure continuation of services following the exhaustion of service provider funds; or
 - Transfer initiated by OWDB to ensure continuation of services following the close-out of sub-recipient's contract.
- C. Program Participant Request for Transfer
OWDB has established the following procedure:
 - Program participant must complete the transfer request form. The form must be properly signed and dated.
 - Current service provider must time and date stamp the participant transfer request immediately upon receipt. The service provider must forward the participant's transfer request form, together with the participant's case file, to OWDB within two (2) working days.
 - Upon receipt of the transfer request form and case file, OWDB staff will conduct an evaluation of submitted transfer request form and the participant's case file. This evaluation must be executed within three (3) business days upon receipt of paperwork. OWDB staff will contact the new service provider to provide information on program participant status.

- Should a request for transfer be denied by OWDB oversight staff, OWDB will return the case file to the original service provider within two (2) working days.
- In the event the service provider wishes not to accept the recommended participant transfer, a final determination will be made by OWDB staff, including participant notification.

III. Change of Service Provider – OWDB Process

OWDB will initiate the process when program participant files must be transferred due to provider of services inability to provide services for reasons of funding exhaustion or contract close-out.

The following procedure outlines the requirements for transferring participant's files from one provider of services to another and the expectations around timelines for doing so.

- OWDB staff will set the criterion with current provider of WIOA Title I services to complete the program participant files transfer.
- The criterion must include specific instructions and timelines for the transferring of participant case files.
- The current service provider must prepare a listing of participant files being transferred, to include status of outstanding financial obligations for services provided to participants. OWDB may provide a listing to the provider of services in lieu of list provided by current service provider, but the service provider is responsible for verifying the list and identifying additional files to be transferred.
- Current provider of services is responsible for providing notice to program participants regarding the transferring of the case file to another provider of WIOA Title I services.
- The entire case file is to be transferred, meaning all documents contained in the participant files.
- Current provider of services is responsible for the security and integrity of participants' case files, until the new service provider is in custody of the documents.
- Upon receipt, OWDB staff will have two (2) weeks to determine the most appropriate service provider(s) to receive the files transferred, and its capacity to continue provision of services to program participants.
- The new service provider shall become responsible for participant files upon receipt of transferred case files.
- The new provider of services must conduct a reasonable review of all files received within thirty (30) days and provide a report to OWDB identifying issues with transferred files, including missing eligibility documentation, etc.
- When necessary, OWDB will provide technical assistance in order to streamline the transferring process.

IV. General Provisions for Financial Obligations

Each provider of WIOA Title I services will be responsible for any financial obligations incurred while the program participant was receiving services from their organization. In the event a service provider is no longer in business, funds must be returned to OWDB.

V. **Should funding cease or be significantly interrupted**

- **Minimize disruption and negative impact on active WIOA participants:** Ensure that individuals currently engaged in services experience the least possible harm and are connected to alternative resources effectively.
 - **Provide clear guidance:** Offer unambiguous instructions to OWDB members, staff, the One Stop Operator, service providers, and partners regarding communication, service delivery adjustments, participant transitions, fiscal management, and administrative closeout procedures.
 - **Ensure compliance:** Maintain adherence to all applicable federal regulations, including the WIOA statute, the Uniform Guidance at 2 Code of Federal Regulations (CFR) Part 200, and specific directives from the U.S. Department of Labor (DOL) Employment and Training Administration (ETA). Compliance also extends to state policies, such as the Hawaii WIOA State Plan and Department of Labor and Industrial Relations (DLIR) directives, as well as local requirements.
 - **Enable structured response:** Function as a pre-defined plan, allowing OWDB and its partners to react strategically and consistently.
1. **Official Notification of Funding Loss:** Receipt of official written communication from the U.S. Department of Labor ETA or the Hawaii DLIR/WDC explicitly stating the cessation or non-allocation of WIOA Title I formula funds designated for the City and County of Honolulu for the upcoming program year. This includes scenarios where funding is reduced to a level that renders current service delivery models unsustainable, as determined by the OWDB Executive Director in consultation with the Board Chair and the County.
 2. **Prolonged Federal Funding Unavailability:** A federal government shutdown or a significant delay in federal appropriations that is officially projected by ETA or DLIR to prevent access to obligated WIOA Title I funds for a period exceeding 60 calendar days. This duration is deemed sufficient to cause critical operational disruption.
 3. **Executive Directive:** A formal directive issued by the Governor of Hawaii or the Mayor of the City and County of Honolulu, based on consultation with DLIR/WDC, mandating the cessation of WIOA Title I operations specifically due to the unavailability or inaccessibility of federal funds.

Establishing clear, verifiable triggers based on official communications or directives is essential. This prevents premature activation based on speculation or, conversely, delays action until the situation becomes unmanageable. The inclusion of a prolonged shutdown addresses the practical reality that lack of access to funds equates to cessation for operational planning.

The authority to formally activate this Funding Cessation Contingency Plan rests with the OWDB Executive Director. This activation must occur upon verification of a triggering event.

- A formal internal memorandum distributed electronically to all OWDB members, staff, the primary contact for the AJC Operator, and the primary contacts for all contracted WIOA Title I service providers.
- The memorandum will clearly state the nature of the funding issue (e.g., complete cessation,

prolonged gap), the verified triggering event, the official effective date for implementing wind-down procedures outlined in this policy, and provide this policy as an attachment or a direct link to this document.

- Subsequent notifications to external partners, participants, employers, and the public will follow the timelines.

Effective, timely, and sensitive communication is critical upon activation of this plan. The following procedures outline the required notification steps, addressing the crucial question of how stakeholders, particularly participants, will be informed.

Internal Notification Cascade (Within 24 hours of activation)

Step 1: Immediate internal alignment: The OWDB Executive Director is responsible for notifying the following parties:

- OWDB Members
- OWDB Staff
- The designated primary contact for the AJC Operator
- The primary contacts for all WIOA Title I contracted service providers. Subsequently, the AJC Operator and Service Providers must inform their respective staff directly involved in WIOA service delivery. The notification content must confirm the plan's activation, state the reason (cessation/gap), specify the effective date, outline immediate actions (such as halting new enrollments), and provide access to this policy document as an attachment or a direct link.

Step 2: State and Partner Notification (Within 48 hours of activation)

Formal notification to State and key partners is essential for coordination. The OWDB Executive Director, or a designated staff member, will formally notify:

- The Executive Director of the Workforce Development Council (WDC)
- The Administrator of the Hawaii DLIR Workforce Development Division
- Designated contacts for WIOA Core Program Partners operating within the City and County of Honolulu AJC system (e.g., Adult Education/Title II, Wagner-Peyser ES/Title III, and Vocational Rehabilitation/Title IV). The focus is on the impact of Title I cessation and coordinating support for potentially co-enrolled participants.
- Key community referral partners identified through the Memoranda of Understanding (MOUs), resource mapping efforts, or established collaborative relationships (e.g., Department of Human Services, Community Colleges, relevant non-profits and WIOA required partners). The content of this notification include a formal statement regarding the WIOA Title I funding status for the City and County of Honolulu, confirmation of the contingency plan activation, the anticipated impact on services, and a request for collaboration on participant transitions and referrals.

Step 3: Participant Notification (Initiated within 72 hours of activation, ongoing)

The critical and sensitive step requiring careful execution by the AJC Operator and contracted service providers, using communication materials and guidance approved by OWDB staff.

- **Methods:** Utilize multiple channels for outreach, including direct contact via phone, email, and postal mail based on participant records. Prominent, clear signage must be posted at all AJC locations on Oahu. Announcements should also be placed on the county website and all social media pages.

- **Content:** Communications must be clear, empathetic, and avoid overly technical jargon. Key elements include:
 - A straightforward explanation of the funding situation and its direct impact on the availability of WIOA Title I services.
 - A general timeline for the wind-down of specific services.
 - Individualized information, delivered by case managers whenever possible, regarding the status of the participant's current services (e.g., expected end date for training, final supportive service payment, status of job search assistance).
 - **Crucially, provide actionable referrals to alternative resources:**
 - Other AJC partner programs (Wagner-Peyser, Voc Rehab, Adult Ed) if the participant may be eligible and **those programs remain funded.**

Community Resource Directories: Provide access (links or physical copies) to relevant local directories

- A designated point of contact for participants with questions.

Step 4: Employer Notification (Initiated within 5 business days of activation)

Employers engaged with the WIOA system must also be informed. Responsibility is with OWDB staff, the AJC Business Services team, the AJC Operator, and contracted WIOA Title I service providers.

- **Methods:** Direct communication (phone or email) is required for employers currently participating in WIOA Title I-funded On-the-Job Training (OJT), Customized Training, potentially Incumbent Worker Training (if applicable), or those with active recruitment agreements relying on WIOA services. Broader notification can occur via existing employer email lists or website postings.
- **Content:** Explain the funding situation and its impact on specific employer services (e.g., cessation of OJT reimbursements, suspension of WIOA-funded screening or recruitment support). Provide a clear contact point for inquiries.

A multi-channel notification strategy ensures that information reaches all affected parties. Direct, empathetic communication with participants is the highest priority, focusing on providing concrete alternatives and support during a difficult transition. Leveraging established partnerships (State, AJC Partners, 211, community organizations) is vital for effective information dissemination and referral pathways.

Table 1: Notification Checklist Summary

Stakeholder Group	Method(s)	Responsible Party	Timeline (Post-Activation)	Key Message Points
Internal	Email Memo	OWDB Exec.	Within 24	Activation

(OWDB Board/Staff, AJC Operator, WIOA Service Providers)		Director	hours	confirmed, reason, effective date, immediate actions (intake freeze), link to policy.
State/Partners (WDC, DLIR, Core Partners, Community Orgs)	Formal Email/Letter	OWDB Exec. Director / Designee	Within 48 hours	Official notice of funding status, impact on Oahu, Title I, plan activation, request coordination for transitions.
Participants	Direct Contact (Phone, Email, Mail), AJC Signage, Website Notices	AJC Operator / Service Providers	Initiate within 72 hours, ongoing	Empathetic explanation, service impact/timeline, individual status update (if possible), referrals (AJC Partners, 211, UI, Community Resources), contact info.
Employers (Engaged in OJT, CT, ETPL, etc.)	Direct Contact (Phone, Email)	OWDB Staff / WIOA Service Providers / AJC Operator / AJC Business Services	Initiate within 5 business days	Funding status explanation, impact on specific employer services (OJT reimbursement halt, etc.), contact info.

Public	Press Release, Website Announcements, Social Media	OWDB ED / City and County of Honolulu PIO	Within 5 business days	Factual statement, general service impact, reference to participant/employer notices, links to alternative resources (AJC, 211).
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Service Wind-Down Strategy

The following actions must be taken immediately upon the activation of this contingency plan:

- **Halt New Enrollments:** Cease all intake, eligibility determination, and enrollment activities for new applicants into WIOA Title I Adult, Dislocated Worker, Youth, and National Dislocated Worker Grants (NDWG) programs. This is a necessary first step to conserve remaining resources for currently active participants.
- **Active Caseload Review:** The AJC Operator and all contracted service providers must conduct an immediate, thorough review of their entire active WIOA Title I participant caseload. This review should identify each participant's current service(s), progress towards goals, planned future activities, and estimated completion dates or next steps. This data forms the basis for service prioritization.
- **Assess Contractual Obligations:** OWDB staff must promptly review all active contracts and agreements with the AJC operator, service providers, and Eligible Training Providers (ETPs). Key elements to review include termination clauses, payment schedules, reporting requirements, and specific closeout procedures outlined in the agreements. Understanding these obligations is crucial for managing the fiscal wind-down.
- **Secure Systems Access:** Confirm and ensure continued access to essential data systems, particularly the state's designated workforce system (e.g., HireNet Hawaii) and any local case management software. Access is vital for participant tracking, service documentation, final reporting, and potential audits throughout the wind-down and closeout period. Contingency planning should address potential loss of access if system costs are WIOA-funded.

Service Prioritization

Given the cessation of funding, providing all planned services will be impossible. Difficult decisions must be made regarding the allocation of remaining staff time and any residual, accessible obligated funds. The following prioritization framework shall guide these decisions, balancing fiscal constraints with the goal of minimizing participant harm:

- **Priority 1: Participants Nearing Completion:** Allocate available resources (staff time, limited final support services, final payments for services already rendered) to support

participants who are actively engaged and demonstrably close to completing a specific short-term training program, work experience placement, or achieving an imminent employment placement. The feasibility of completion must be assessed against the wind-down timeline and available funds. This approach aims to maximize the number of participants achieving a positive outcome before services cease.

- **Priority 2: Participants in Longer-Term Training (ITAs):** For participants funded through Individual Training Accounts (ITAs) enrolled in longer programs (e.g., certificate or degree programs at ETPs):
 - Assess the feasibility of the participant completing the current semester, module, or credential within the available timeframe and funding.
 - Engage immediately with the participant and the training provider (ETP) to explore alternatives. This includes identifying potential transfer options for earned credits, exploring eligibility for other financial aid (Pell Grants, scholarships), or connecting the participant with other AJC partners (like Voc Rehab, if applicable) who might offer training support.
 - Issue final tuition payments *only* for training services actually delivered up to the point of funding cessation or an agreed-upon, documented withdrawal/completion date, strictly adhering to ETP contract terms and federal cost principles (2 CFR 200). No payments shall be made for services not rendered.
- **Priority 3: Participants Receiving Career Services:** For participants primarily receiving basic or individualized career services:
 - Rapidly transition service delivery to focus on final job search assistance, resume finalization, interview preparation support, and intensive, documented referrals to alternative resources.
- **Support Services:** The issuance of new supportive services (e.g., funds for transportation, childcare, tools, uniforms) must cease immediately upon activation, except under two narrow conditions: 1) where there is a pre-existing, legally binding obligation to provide the service for a defined period, or 2) where a final, minimal supportive service is deemed absolutely essential by the case manager (with OWDB staff approval) to enable a Priority 1 participant to complete their final activity within the immediate wind-down period (e.g., final bus pass to attend last week of training). All exceptions must be meticulously documented with clear justification.

Managing Referrals and Transitions

A passive referral is insufficient during a funding cessation. Active transition support is paramount:

- **Active Case Management Focus:** Case managers must shift their primary focus from ongoing service delivery to intensive transition planning during their final interactions with participants. This involves:
 - Clearly and compassionately communicating the reason for service cessation and the timeline.
 - Collaboratively developing a written, documented transition plan with each participant, outlining their immediate next steps and potential resources.

- Facilitating "warm handoffs" whenever possible. This means directly connecting the participant (e.g., via a three-way call, joint meeting, or direct email introduction) to staff at AJC partner programs (Voc Rehab, Adult Ed, Wagner-Peyser ES) or key community resource providers (e.g., identified housing assistance programs, food banks, specific resources from community directories).
- **Coordination Meetings:** The OWDB Executive Director should convene emergency coordination meetings with AJC core partners and key community organizations (identified through MOUs or referral patterns). The purpose is to share information about the scope of the WIOA shutdown, the needs of the affected participant population, and to streamline referral pathways and information sharing to the extent possible.

The wind-down phase requires careful triage and resource management. Prioritizing participants closest to achieving a tangible outcome represents the most responsible use of dwindling resources. However, the core of minimizing disruption lies in robust, active transition support, moving beyond simple referrals to concrete planning and facilitated connections with alternative support systems. The absence of specific federal guidance on prioritization during cessation necessitates this locally defined, ethical framework focused on participant well-being.

Table 2: Service Prioritization Matrix

Participant Category	Action Upon Activation	Priority Level	Allowable Services During Wind-Down (Subject to Fund Availability)	Key Transition Steps/Referrals
Near Completion Training/Work Experience (< 1 month remaining)	Assess feasibility of completion.	1 (Highest)	Final service delivery, minimal essential support services (case-by-case approval), final payments for services rendered.	Complete activity if feasible, job placement assistance, UI application, 211, final case notes.
Mid-Training ITA (Longer-	Assess completion	2	Final tuition payment <i>only</i>	Explore credit transfer,

term program)	feasibility, contact ETP & participant.		for services rendered pre-cessation. Staff time for transition planning/referral.	alternative funding (Pell, etc.), refer to AJC partners (VR/Adult Ed), UI, 211, document outcome.
Active Work Experience (Longer duration)	Notify worksite & participant of end date.	2	Staff time for transition planning, final timesheet processing/payment (if applicable).	Refer to AJC partners, UI, 211, other job search resources, document experience gained.
Career Services Only (Job Search, etc.)	Transition to final assistance & referral.	3	Final resume/interview prep, intensive referral support.	Warm handoffs to Wagner-Peyser ES, UI application, 211, Community Resources, Job Boards (HireNet).
Youth Program Elements (Varies greatly)	Assess specific element status (e.g., work experience, tutoring).	1-3 (Varies)	Apply prioritization based on proximity to completion/outcome for the specific element. Final payments for services rendered.	Transition planning tailored to youth needs, connection to educational institutions, youth-specific community resources, 211, document progress.
Support	Cease issuance	N/A	Staff time for	Refer to 211,

Service Only (Standalone)	immediately.		notification and referral.	DHS, community agencies providing similar support (e.g., childcare subsidies, transportation assistance).
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Participant Transition and Exit

The process of formally exiting participants from WIOA Title I programs during a funding cessation requires careful consideration of federal definitions and practical realities.

Applying Exit Definitions

The standard WIOA definition of exit occurs when a participant goes 90 consecutive days without receiving services (other than self-service, information-only, or follow-up), with no future services planned. The exit date is retroactively set to the last date of qualifying service. A funding cessation complicates this, as inactivity is forced, not participant-driven.

Therefore, for the purposes of this policy and subsequent reporting:

- For participants whose WIOA Title I services cease *solely* due to the funding cessation event, the "last date of service" used to determine the exit date will be the final day a substantive WIOA Title I service was actually delivered (excluding informational contacts related to the shutdown itself) OR the official date WIOA Title I-funded operations cease, whichever occurs first.
- This rationale must be clearly and consistently documented in each affected participant's case file within the designated case management system HireNet Hawaii.
- While the system's 90-day clock may technically continue, the programmatic requirement of "no future services planned" is met immediately upon the confirmed cessation of funding. OWDB staff must coordinate with State DLIR WDD administrator to ensure exits are processed correctly in the system under these circumstances, reflecting the funding cessation as the reason.
- The Common Exit Policy must still be applied. If a participant is co-enrolled in other DOL-funded programs subject to common exit (e.g., Wagner-Peyser), their exit from WIOA Title I should align with their exit from all such programs, requiring close coordination with relevant partners during the wind-down.

Case Management During Wind-Down

The role of case management shifts significantly during this period:

- Deliver final services according to the prioritization framework.
- Dedicate significant effort to intensive transition planning and referral activities.
- Ensure meticulous documentation. All services provided, assessments conducted, transition plans developed, referrals made, and final case narrative summaries must be accurately and

completely entered into the case management system *before* staff depart or system access becomes limited. This documentation is critical for final performance reporting, potential audits, and demonstrating due diligence in participant support.

Final Service Delivery

Prioritized services identified should be delivered up until the official operational cessation date determined by OWDB or until all accessible, obligated funds for that purpose are exhausted, whichever comes first. The final date and nature of service must be communicated clearly and in advance to the affected participants.

Follow-Up Services

WIOA mandates the provision of follow-up services for 12 months post-exit for Adult, Dislocated Worker, and Youth participants. However, a complete cessation of WIOA Title I funding makes the provision of these federally funded follow-up services impossible. This presents a significant compliance challenge.

- **Transparency:** This limitation must be communicated honestly and clearly to all exiting participants during transition planning. Participants should understand that WIOA-funded follow-up contact and support will not be available after the program ceases operations.
- **Referral:** Provide participants with information and referrals to partner agencies or community resources that *might* offer ongoing support, mentorship, or check-in services (e.g., specific non-profits, alumni networks, professional associations). Make clear that these are referrals, not guaranteed WIOA-funded services.
- **Alternative Funding Exploration:** OWDB will explore, but not commit to without explicit approval and secured funding, the possibility of using non-WIOA funds (e.g., county general funds, rapid response funds if applicable and allowable for this purpose, emergency grants, philanthropic support) to provide minimal transition support or check-ins for a limited period post-cessation. Any such effort would be outside the scope of WIOA requirements and funding.

Adapting the exit definition is necessary to maintain reporting integrity in an abnormal situation. The inability to provide mandated follow-up services due to funding cessation is a critical issue requiring transparent communication with participants and documentation of the circumstances preventing compliance.

Fiscal Management and Grant Closeout

An orderly and compliant fiscal wind-down and grant closeout process is mandatory under federal regulations, even amidst the disruption of a funding cessation. This requires meticulous attention to records, expenditures, reporting, and property management.

Records Management

Upon activation of this plan, immediate steps must be taken to secure and organize all grant-related records:

- Gather and secure all physical and electronic participant files, eligibility documentation, service records, case notes, financial ledgers, invoices, receipts, grant agreements and modifications, contracts with providers and vendors, personnel records related to grant staff,

and all administrative documentation.

- Ensure all records are complete, accurate, legible, and readily accessible to authorized personnel involved in the closeout process.
- Adhere strictly to federal record retention requirements outlined in the Uniform Guidance (2 CFR 200.334 through 200.338) and specific grant terms. Typically, records must be retained for three years following the submission of the final expenditure report, but this period can be longer if audits or litigation are pending. Secure storage solutions must be identified, potentially requiring coordination with County record management.

Final Expenditures and Liquidation

Fiscal discipline is paramount during wind-down:

- **Cease New Obligations:** No new financial obligations may be incurred against the WIOA Title I grant after the activation date of this plan, unless explicitly authorized as part of the approved wind-down strategy (e.g., a final approved payment to an ETP for services already rendered).
- **Process Allowable Costs:** Process payments only for allowable costs that were properly incurred for goods received or services rendered *prior* to the funding cessation date or during the authorized wind-down period, consistent with the grant terms, approved budget, and the cost principles outlined in 2 CFR 200 Subpart E. Costs must be reasonable, necessary, allocable, and adequately documented.
- **Liquidate Obligations:** All valid obligations incurred during the grant's period of performance must be liquidated (paid) within the official closeout timeframe. In a cessation scenario, ETA may provide specific guidance on the POP end date and liquidation timeframe.
- **County Coordination:** Maintain close communication and coordination with the City and County of Honolulu finance and procurement departments to ensure timely processing of final invoices and payments according to County procedures.

Final Reporting

Accurate and timely submission of all final reports is a cornerstone of grant closeout:

- **Final Performance Reports:** Submit any required final WIOA performance reports, including participant data through the Participant Individual Record Layout (PIRL), as directed by ETA and the State DLIR/WDC. Ensure data reflects exits processed.
- **ETA Closeout Package:** Submit all documents required under ETA's streamlined closeout process. This may include:
 - Government Property Closeout Inventory Certification (certifying whether equipment meeting the federal definition was purchased).
 - Property Listing Form (if applicable, detailing equipment items).
 - Final approved Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) if indirect costs were charged.
 - Note: The Grantee's Detailed Statement of Costs may not be required for formula grants like WIOA Title I per some guidance, but confirm specific ETA instructions received during closeout initiation.

Allowable Closeout Costs and Staff Time

Recent updates to the Uniform Guidance (effective Oct 1, 2024, potentially applied earlier by

agencies) explicitly allow recipients to charge administrative costs associated with performing required closeout activities after the official period of performance ends. These costs must be reasonable, allocable, and documented.

- **Funding Challenge:** The critical issue during a funding *cessation* is that the WIOA funds themselves may be frozen or entirely unavailable. While closeout costs are *allowable*, there may be no WIOA funds to charge them against. Therefore, OWDB must proactively identify alternative funding sources (e.g., requesting emergency County general funds, utilizing available Rapid Response administrative funds if permissible, seeking philanthropic support) to cover the essential administrative tasks required for compliant closeout. Efforts to secure such funding must be documented.
- **Staff Time Prohibition:** It is crucial to note that ETA policy generally *prohibits* grant recipients from direct charging staff salaries and wages to the WIOA grant for work performed *after* the period of performance end date, even if that work is related to closeout. This seemingly contradicts the allowability of closeout costs but reflects a long-standing ETA interpretation. Therefore, the necessary staff work for closeout (final reporting, record archiving, audit support) must typically be funded by other sources (e.g., County administration, other grants) or performed by staff whose time is allocated elsewhere. Any deviation would require explicit, written pre-approval from the ETA Grant Officer.

Property and Equipment

Proper accounting for grant-funded property is mandatory:

- Conduct a final physical inventory of all equipment (items meeting the federal definition, threshold typically \$5,000 or \$10,000 depending on purchase date and applicable guidance) and any real property acquired or improved with WIOA Title I funds.
- Complete and submit the Government Property Closeout Inventory Certification and, if applicable, the Property Listing Form as part of the ETA closeout package.
- Formally request disposition instructions from the ETA Grant Officer or designated state contact for any federally-owned property or equipment exceeding the reporting threshold, following procedures in 2 CFR 200.313.

Final Audits and Fund Recovery

The closeout process does not end the possibility of audits or financial reconciliation:

- Cooperate fully with auditors conducting the organization's Single Audit (if applicable) or any program-specific audits initiated by DOL OIG, ETA, or the State. Ensure all required records are available.
- Understand that the OWDB remains obligated to return any funds due to the federal government as a result of later refunds, corrections, disallowed costs identified in audits, or other transactions, even after the grant has been officially closed by ETA.

Grant closeout under normal circumstances is complex; a funding cessation adds significant pressure and resource constraints. Meticulous record-keeping, adherence to reporting deadlines, proactive identification of non-WIOA resources for closeout tasks (especially staff time), and clear communication with ETA/State are essential for navigating this process compliantly.

Table 3: Grant Closeout Checklist

Task Area	Specific Action Item	Regulatory /Guidance Reference	Responsible Party (OWDB/AJC Role)	Deadline/Timeline	Status/Notes
Records	Secure all physical & electronic participant, financial, admin records.	2 CFR 200.334-338; Grant Terms	OWDB Staff / AJC Operator / WIOA Service Providers	Immediate upon activation	Confirm storage location & access plan.
Expenditures	Cease incurring new obligations.	2 CFR 200 Cost Principles	All Staff	Immediate upon activation	
	Process final payments for allowable costs incurred pre-cessation.	2 CFR 200.403-405; Grant Terms	OWDB Fiscal / County Finance	Within liquidation period (90/120 days or ETA directive)	Ensure proper documentation.
	Liquidate all valid prior obligations.	2 CFR 200.344; ETA Guidance	OWDB Fiscal / County Finance	Within liquidation period	Track carefully; no unliquidated obligations on final reports.

Reporting	Submit Final Quarterly Program Reports.	ETA Reporting Instructions	OWDB Fiscal/Program Staff	45 days post-final quarter end (standard); confirm ETA directive	Use as primary closeout financial report. Accrual basis.
	Submit ETA Closeout Package Documents	TEGL 12-22; ETA Closeout Guidance	OWDB Fiscal/Admin Staff	90/120 days post-POP end (or ETA directive)	Submit via GrantSolutions or email as directed.
Closeout Costs	Identify & document allowable closeout admin costs incurred post-POP.	2 CFR 200.472	OWDB Fiscal/Exec Director	During closeout period	Ensure costs are reasonable & allocable.
	Secure non-WIOA funding for closeout tasks (esp. staff time).	ETA Policy	OWDB Exec Director / County Liaison	ASAP upon activation	Document efforts & funding source.
Property	Conduct final inventory of WIOA-funded equipment/property.	2 CFR 200.313	OWDB Staff / AJC Operator / WIOA Service Providers	Prior to submitting closeout package	Use correct definition/threshold.
	Submit Property Certification & Listing	ETA Closeout Package	OWDB Staff	With closeout package	

	Form.				
	Request/follow disposition instructions from ETA/State.	2 CFR 200.313	OWDB Staff	Upon receiving instructions	Document actions taken.
Audit Prep	Ensure all records are audit-ready.	2 CFR 200 Subpart F	OWDB Fiscal/Admin Staff	Ongoing through retention period	Cooperate fully with auditors.
	Process any fund returns due to audits/refunds.	2 CFR 200.344(h)	OWDB Fiscal Staff	As required post-closeout	Maintain communication with ETA/State.

Roles and Responsibilities

Clear assignment of roles and responsibilities is essential for the effective implementation of this contingency plan.

- **OWDB Board:** The Board retains its governance and oversight function. Specific responsibilities during a funding cessation include:
 - Receiving regular, timely updates from the Executive Director on the situation and plan implementation.
 - Providing strategic direction and making policy decisions if unforeseen circumstances require adjustments to this plan.
 - Acting as advocates for the City and County of Honolulu workforce needs, potentially seeking alternative resources (e.g., County funding for closeout activities, support for affected participants) from County government or other sources.
- **OWDB Executive Director:** Holds overall responsibility for activating and implementing this plan. Key duties include:
 - Verifying triggering events and formally activating the plan in consultation with the Board Chair and County liaison.
 - Serving as the primary point of contact and liaison with the City and County of Honolulu administration, the State WDC and DLIR, and the OWDB Chair.
 - Overseeing the execution of all notification procedures.
 - Directing the activities of OWDB staff and ensuring effective coordination with the AJC Operator and contracted service providers.

- Ensuring fiscal integrity throughout the wind-down and overseeing the compliant completion of all grant closeout procedures.
- **OWDB Staff:** Support the Executive Director across all facets of plan implementation. Responsibilities, assigned by the Executive Director, may include:
 - Executing specific notification tasks (e.g., drafting and sending communications to state partners, employers).
 - Managing fiscal reconciliation, preparing final financial and performance reports.
 - Overseeing record management and archiving.
 - Providing guidance, technical assistance, and oversight to the AJC Operator and service providers regarding policy implementation, participant transitions, and data collection.
 - Maintaining detailed logs of communications, decisions, and actions taken during the contingency period.
- **One Stop Operator:** As the entity managing the day-to-day operations of the American Job Center, the Operator plays a critical front-line role:
 - Managing AJC staff and overseeing the operational wind-down of WIOA Title I services within the center(s).
 - Implementing the participant notification plan accurately and sensitively.
 - Conducting the active caseload review and implementing service prioritization according to OWDB direction.
 - Leading participant transition planning and referral activities, including facilitating warm handoffs.
 - Ensuring all participant data, service records, and case notes are entered accurately and timely into the designated case management system (e.g., HireNet Hawaii).
 - Cooperating fully with OWDB staff requests related to final reporting, data validation, and other closeout activities pertinent to AJC operations.
- **Contracted Service Providers:** Entities contracted to deliver specific WIOA Title I services (e.g., youth programs, specialized occupational training) are responsible for:
 - Implementing participant notification procedures for their specific caseloads, using OWDB-approved materials.
 - Winding down their contracted services in accordance with OWDB prioritization directives and the terms of their contracts.
 - Providing complete and accurate final service delivery data, participant outcomes, and any required documentation to the OWDB or AJC Operator in a timely manner.
 - Submitting final invoices for services rendered and complying with all contractual closeout requirements.
- **The City and County of Honolulu:** Relevant departments,
 - Providing administrative oversight and fiscal processing support consistent with the County's structure and procedures.
 - Assisting OWDB staff in securing physical and electronic records.
 - Processing final vendor payments and payroll according to County timelines and procedures.
 - Serving as a potential source, subject to Mayor and Council approval, for emergency bridge funding or allocation of existing County resources to support mandatory but unfunded closeout activities (e.g., staff time, record storage).

A clear delineation of these roles ensures accountability and coordinated action during a potentially chaotic period. The success of the plan hinges on effective collaboration between the OWDB, its staff, the AJC Operator, service providers, and supporting County departments.

Table 4: Key Contacts and Responsibilities Summary

(Note: This table should be populated and maintained with current contact information)

Role/Entity	Name / Contact Info	Key Responsibilities during Funding Cessation
OWDB Chair	[Name, Email, Phone]	Board Oversight, Policy Decisions, Advocacy
OWDB Executive Director	[Name, Email, Phone]	Plan Activation, Overall Implementation, State/County Liaison, Oversight of Notifications & Closeout
OWDB Fiscal Lead	[Name, Email, Phone]	Fiscal Reconciliation, Final Reporting (Financial), Expenditure Tracking, Closeout Package Prep
OWDB Program/Data Lead	[Name, Email, Phone]	Performance Reporting, Data Validation, Provider Guidance, Transition Support Oversight
OWDB Admin Lead	[Name, Email, Phone]	Record Management, Property Inventory, Notification Support
AJC Operator Manager	[Name, Email, Phone]	AJC Staff Management, Operational Wind-Down, Participant Notifications, Caseload Review, Transition Implementation

AJC Business Services Lead	[Name, Email, Phone]	Employer Notifications, OJT/CT Wind-Down Coordination
WIOA Title I Youth	[Name, Email, Phone]	Youth Participant Notification, Service Wind-Down (Youth), Final Data Submission
WIOA Title I Adult	[Name, Email, Phone]	
WIOA Title I Dislocated Worker	[Name, Email, Phone]	
[Any Other Provider Contact]	[Name, Email, Phone]	Participant Notification (Specific Cohort), Service Wind-Down, Final Data Submission
BFS	[Name, Email, Phone]	County Coordination, Resource Advocacy Support
County Finance Contact	[Name, Email, Phone]	Final Payment Processing, Fiscal Procedure Guidance
State WDC Contact	[Name, Email, Phone]	State-Level Coordination
State DLIR WDD Contact	[Name, Email, Phone]	State-Level Coordination, MIS Guidance

Policy Review and Updates

To ensure this Funding Cessation Contingency Plan remains relevant, effective, and compliant, regular review and updates are necessary.

Review Schedule

This policy document shall be formally reviewed on an annual basis. This review will be conducted by designated OWDB staff, with findings and any recommended revisions presented to the appropriate OWDB committee (e.g., Executive Committee, Special Projects Committee)

for consideration.

Update Triggers

In addition to the annual review, this policy must be reviewed and updated upon the occurrence of any of the following:

- **Regulatory or Legislative Changes:** Significant amendments to the WIOA statute, substantial revisions to the federal Uniform Guidance (2 CFR Part 200), issuance of new binding ETA Training and Employment Guidance Letters (TEGLs) impacting program closure or closeout, or major changes to the Hawaii WIOA State Plan or DLIR policies related to funding or operations.
- **Lessons Learned:** Following any exercise or drill simulating a funding cessation, or in the event of an actual funding interruption (whether affecting City and County of Honolulu directly or providing relevant experience from other jurisdictions), a post-event review shall be conducted to identify areas for policy improvement.
- **Operational or Partnership Changes:** Significant changes in the local service delivery structure, such as a change in the AJC Operator, major shifts in key partnerships referenced in the plan, or the adoption of new technologies or systems impacting the procedures outlined herein.

Approval Process

All substantive revisions or updates to this policy must be formally approved by the Oahu Workforce Development Board. The approval process shall follow the Board's standard procedures for policy adoption, which may include requirements for partner consultation and public comment periods, consistent with the transparency principles emphasized in WIOA for local plan development.

Minor administrative updates (e.g., correcting contact information in Table 4) may be made by the Executive Director with notification to the Board Chair.

Maintaining this policy as a living document is crucial. The workforce development landscape, federal regulations, and local operational contexts evolve. Regular reviews and timely updates triggered by significant changes ensure that the OWDB possesses a practical and compliant roadmap should a WIOA funding cessation occur.

Conclusion

This policy establishes a necessary framework for the Hawaii County Workforce Development Board and its partners to navigate the challenging scenario of a significant interruption or complete cessation of WIOA Title I funding. By outlining clear triggers, notification protocols, service wind-down strategies, participant transition procedures, compliant closeout actions, and defined roles, this plan aims to provide structure and minimize harm during a potential crisis.

The successful implementation of this plan hinges on proactive preparation, clear communication, strong partnerships, and the ability to make difficult decisions regarding resource allocation. Key challenges identified include adapting standard procedures (like participant exit) to the unique circumstances of a shutdown and addressing the critical gap between the federal requirement for grant closeout and the potential lack of WIOA funds to

support the necessary administrative activities, particularly staff time. Addressing this requires ongoing advocacy and planning with County government to ensure resources are available for mandatory compliance tasks.

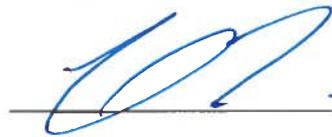
Regular review and updating of this policy are essential to ensure its continued relevance and effectiveness in safeguarding the interests of participants and ensuring responsible stewardship of public funds, even in the face of funding uncertainty. This contingency plan serves as a vital tool, enabling the OWDB to respond thoughtfully and strategically, rather than reactively, should WIOA Title I funding be disrupted.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

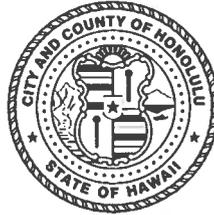


Harrison Kuranishi
Executive Director

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HARRISON KURANISHI
EXECUTIVE DIRECTOR

June 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #17-25**

SUBJECT: CASE MANAGEMENT

PURPOSE:

The purpose of this policy is to establish guidance on the provision of case management and participant reporting requirements in programs funded by Title I of the Workforce Innovation and Opportunity Act (WIOA).

POLICY:

The Workforce Innovation and Opportunity Act (WIOA) provides an opportunity for a greater emphasis on customer-focused and effective case management. In providing guidance, support, and motivation to customers seeking training, employment, and career advancement, staff take a holistic case management approach that utilizes multiple techniques to address and provide solutions for a variety of barriers, assessing customer needs. Case management also entails coordinating, tracking, and reporting customer activities and services via the participant individual record layout (PIRL). There also is an important connection between case notes and related issues, such as planning, implementation, follow-up, and success. Federal regulations require the Oahu Workforce Development Board (OWDB) to submit accurate participant reports and validated individual participant data. The OWDB is issuing this policy to ensure that participant data are entered into HireNetHawaii within acceptable timeframes and in the correct manner.

Case Management:

Case management is the provision of a client-centered approach in the delivery of services designed to provide career exploration and guidance, continued support for educational attainment opportunities for skilled training in in-demand occupations and industries and case notes must provide detailed information on the coordination of these services.

In addition, case management includes broader functions like facilitation, communication, and coordination to ensure that each youth receives one on one contact and guidance as needed to

participate in and benefit from the activities set forth in the Individual Employment Plan/Individual Service Strategy. All case management activities must be documented in case notes.

Any medical and disability-related information about a particular individual must be kept strictly confidential and must be stored separately and securely from other personnel information.

Case Load:

Each participant's activity must be promptly documented and noted in their case file. The staff caseload cannot exceed 75 participants at any given time. To ensure the integrity of the program and provide participants with timely service.

Case Notes:

Case notes are a key part of the customer file and must be maintained electronically in HireNetHawaii. Case notes describe the plans, activities, actions, and results of services provided to customers. Accuracy and completeness in case notes are critical because they are used by staff as planning tools when interacting with customers and may be reviewed in HireNetHawaii. Case notes must be consistent with the documentation kept in the customer file. All sub-recipient and contractor staff are directed to follow these guidelines for creating and maintaining case notes:

Include the date of entry and identify the case manager or other staff person.

- Write case notes promptly while the information is fresh.
- Provide a clear history of the customer's situation, barriers, self-sufficiency goals, occupational goals, and services needed and/or received, and describe how the customer will benefit from services.
- Highlight major events, crises, barriers, or anything pertinent to the customer continuing in a program (e.g., job search or training) or continuing to receive services.
- Identify who initiated the contact and where the contact took place. Show frequency of customer contact – at least once a month, if not more often – and if there has been a lack of regular customer contact, document why.
- Maintain notes in chronological order by date and service sequence. An issue mentioned in one case note should include a plan of action or resolution and be followed up in subsequent case notes to clarify how the issue was resolved.
- A separate entry shall be made for each contact. It is not acceptable to list a month's worth of case notes in one case note entry in HireNetHawaii.
- Identify any supporting documentation requested from the customer or a third party and record follow-up efforts to obtain the documentation.

Adult and Dislocated Worker Programs – Intake Case Notes:

Listed below are examples of case notes from the intake process. Case notes must be entered upon every point of contact with a participant. Every point of contact is defined as all correspondence with the participant, including email, phone calls, letters, and mail-outs to the participant. Case notes should always be entered immediately, and the subject should also be distinguishable, such as Individual Training Account (ITA) payment, ITA check request, Support Service Request, Support Service Payment, behavior during a workshop, follow-up, and more.

During the intake process, the following should be case noted:

- If the participant is employed or unemployed, household income and family size;
- What eligibility documentation that is missing;
- When a participant statement is used, it must always be case noted with reason why;
- Eligibility for any special projects must be case noted detailing the criteria for eligibility;
- What type of training services or other services participant is interested in, if any;
- The job search skills the participant would like to work on, or skills that are lacking;
- The identified barriers and workshops the participant may be encouraged to participate in;
- If recommendations are given and/or the participant is referred to training; and
- Instructions on next steps along with a date and time for next appointment.

Adult and Dislocated Worker Programs – Supportive Services Case Notes:

A supportive service is assistance that is necessary to enable eligible participant who cannot afford to pay for such assistance and who are unable to obtain supportive services through other programs to participate in authorized Workforce Innovation Opportunity Act (WIOA) activities. Supportive services enable the participant to remain in or to gain employment, stay in training or successfully complete program participation, and are provided on an individual case-by-case basis. Case notes must include what is needed, the barrier it's resolving, the lack of assistance available from other entities, and the participants inability to pay for the support.

Adult and Dislocated Worker Programs – Training Case Notes:

Case notes related to training should document the following:

- Pre-training case notes (where the participant is at in the process of gathering their training information);
- Waitlisted information (if the participant has to be waitlisted);
- Financial Aid eligibility;
- Approval of training, including the type of program (area of study), the credential type, and the anticipated end date of training;
- All waivers requested and approved; Case Management and Participant Reporting, all changes to the participant training (program switch, attending two schools, etc);
- Dropped out of training with reason noting any credential that may have been received; Completion of training, indicating the degree or certification attained, including the date attained; and
- All check requests and payments made charged to the Individual Training Account (ITA).

Adult and Dislocated Worker Programs – Closure/Exit and Follow-up Case Notes:

While there are additional activities that must occur and updates made in HireNetHawaii, the following activities and information must be documented in case notes:

- Participant employment closure/exit information, including place of employment, number of hours working, wage, and position;
- Detail the closure/exit in case notes, documenting all action plans, activities, and training has been completed;
- Follow-up activity documented at least quarterly during the 1st through the 4th quarters after exit, including employer, wage, hours, position, address, phone, contact numbers, and any name changes;

- Any assistance the participant may need to maintain or re-gain employment.

Youth Programs Case Notes:

Case notes are a very important aspect of the job; staff are required to update participant case notes at every point of contact with a youth. Case notes must document all of the following:

- Objective assessment, determination of school status and eligibility barrier determination. Testing information, both dates and grade levels must match actual documentation in the file. Show the need for any special accommodations as well as areas of strength;
- Goal development and monitor progress toward attainment of that goal. The goal attainment date must match case note date;
- Referrals to 14 elements available during participation and who is providing the services; Are any partner agencies providing resources?
- When participating in work experience activities, information on the work experience placement site and supervisor contact information. Does worksite placement align with career goals? Is this placement part of a career pathway? Detailed work experience notes documenting progress and any issues at the worksite;
- Academic and occupational training plan engagement. Document all changes to the learning plan (program switch, attending two schools, etc.);
- Terminations or dropped from activities with reasons why;
- Completed academic or occupational skills training with a high school diploma, high school equivalency certificate, degree or certification attained. You must include the actual date in case notes. Date of attainments must match actual documentations;
- All check requests and payments made for incentives, supportive services and those items charged under the Individual Training Account (ITA);
- All waivers requested and approved.

Youth Programs – Intake Case Notes:

Listed below are examples and instructions regarding the content of case notes for the Youth Programs. Case notes must be entered upon every point of contact with a participant. Every point of contact is defined as all correspondences with the participant, such as, emails, phone calls, letters, and mail-outs to the students. Case notes should always be entered immediately and the subject should also be distinguishable such as Objective Assessment, Follow-up, Goal Attainment, etc.

During the intake process, case notes should (notes may vary depending on individual):

- If client is an in-school or out-of-school youth, and if they are employed, have previous work experience, household income, and family size;
- What eligibility documentation you have;
- What type of services are they most interested in;
- If, and how, are they at risk of dropping out;
- Barriers identified;
- Recommendations on next steps that will occur to get participant engaged along with a planned next date and time to meet.

Youth Programs – Objective Assessment Case Notes:

Each youth receives an objective assessment of academic levels, skill levels, and service needs. The assessment shall, at a minimum, include a review of occupational skills, basic skills, prior work experience, employability, interest, aptitudes, supportive service needs, and developmental needs.

Youth Programs – Program Participation Case Notes:

A youth's participation begins after they are determined to be eligible and receive a service funded by the program. This is known as the participation date and must be noted in the case. The participation date must be case noted. Any activity provided under any of the 14 required program elements initiates participation. The length of a youth's participation should be appropriate to their needs, as identified through an objective assessment and as documented in the Individual Service Strategy (ISS).

Youth Programs – Work Experience Case Notes

Work experience is designed as a planned, structured learning experience that takes place in the workplace for a limited period of time. The intent of work experience is to provide youth with opportunities for career exploration, skill development, and to enhance their work readiness skills in preparation for employment. The goal is not to benefit the employer. It is competency based skills training and documentation of progress must be recorded in case notes along with the following:

- Initial placement indicating the job-site and supervisor along with supports provided must be documented. Structured learning plan along with the proposed time length for the work experience based on the individual needs of the participant;
- Case notes need to indicate the assessment that determined that the youth was lacking in employability skills;
- Every 30 days the contractor shall review and document the progress of work experience participants;
- Is the work experience paid or unpaid;
- Indicate which category the work experience aligns with:
 - Summer employment opportunity
 - Pre-apprenticeship program
 - Internship and job shadowing
 - On-the-job-training
- Identify the academic and occupational education that coincides with the work experience.

Youth Programs – Supportive Services Case Notes:

A supportive service is assistance that is necessary to enable eligible youth who cannot afford to pay for such assistance and who are unable to obtain supportive services through other programs to participate in authorized Workforce Innovation Opportunity Act (WIOA) activities. For youth participants such activities must correspond to the 14 WIOA elements for youth programs. Supportive services enable the participant to remain in or to gain employment, stay in training or successfully complete program participation, and are provided on an individual case-by-case basis. Case notes must include what is needed, the barrier it's resolving, the lack of assistance available from other entities, and the participants inability to pay for the support.

Youth Programs – Incentives Case Notes:

Incentive payments are permitted for recognition and achievement directly tied to training activities and work experience. Incentive payments are tied to the goals of the program identified in the participant's ISS. The WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. Document in case notes the amount of the payment, how the payment was made, the specific achievement made to be eligible for the payment and provide informant on how it relates to the participants' ISS.

Youth Programs – Closure/Exit and Follow-up Case Notes:

While there are additional activities that must occur and updates made in HireNetHawaii, the following activities and information must be documented in closure/exit case notes:

- Participant employment closure/exit information, including place of employment, number of hours working, wage, and position;
- Detail the closure/exit in case notes, documenting all action plans, activities, and training has been completed.

Follow-up services must be provided for a duration on 12 months. Follow-up services are activities after completion of participation to monitor and enhance a youth's success during their transition to employment and further education, and to provide assistance as needed for a successful transition. The type of services provided and the duration of each service must be determined based on the needs of the individual and documented in the case notes. When follow-up contact is made, inquiries on employer, wage, hours, position, address, phone and other contact numbers, and name changes should be updated and recorded in case notes.

Follow-up Services:

Follow-up services must be based on each participant's needs. Participants must be made aware that follow-up is part of the commitment they make in joining the program; the message will be positive in tone and show the individual the benefit of follow-up.

Follow-up contacts must be meaningful and person-centered. Contacts may not simply be a way to obtain needed data; therefore, a phone call or text to see if the participant is employed or in school is not sufficient. Effective follow-up contacts, at a minimum, should include open-ended questions to help pro-actively identify the need for follow-up services. Follow-up services must, at a minimum:

- Be integrated into the program design and be seen as having as much value as all other program components;
- Assist participants in overcoming barriers that may interfere with the achievement of their career objectives;
- Provide proactive and reactive interventions to encourage retention in education or employment;
- Provide intense and on-going job retention support for both the participant and employer
- Facilitate communication and problem resolution;
- Provide immediate intervention for both participant and employer as needs are identified;
- Link the participants to partners to support advancement to better jobs or postsecondary education and training;

- Help troubleshoot employment and personal issues; and Case Management and Participant Reporting
- Occur frequently enough to address any issues the youth is currently facing.

Follow-up services must begin immediately following the last date of service (closure date). Follow-up services do not trigger the exit date to change or delay exit for performance reporting.

Adult and Dislocated Worker Programs Follow-up:

WIOA requires that follow-up services must be made available to Adult and Dislocated Workers for a period up to 12 months following exit from the program. The goal of follow-up services is to ensure job retention, wage gains and career progress for participants who have entered unsubsidized employment.

Follow-up services may include, but are not limited to the following:

- 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; and
- Providing individuals with referrals to other community resources.

Adults and Dislocated Workers in follow-up services may receive supportive services.

Adult and Dislocated Worker participants in follow-up shall be contacted at least once (1) per quarter. Follow-up may be conducted by telephone, in person, via e-mail (or other social media), or by written correspondence. Preference is for the follow-up to be through a medium that increases the probability of interaction with the participant and also increases the probability of continued contact.

Follow-up services require contact, interaction, and the provision of an acceptable follow-up service. As an example, a text to provide assistance with a job or work-related problem is follow-up. However, although sending a letter might be considered “following-up”, this is not a preferred follow-up service. Follow-up should show interaction and the provision of an actual follow-up service.

Youth Programs Follow-up:

Follow-up services must be made available to all WIOA Youth for a minimum of 12 months from the date of exit. The goal of follow-up services for youth is to enable participants to continue lifelong learning and achieve a level of self-sufficiency to ensure job retention, wage gains, and postsecondary education and training progress.

Follow-up services for youth may include, but are not limited to the following program elements:

- Supportive services;
- Adult mentoring;
- Financial literacy education;

- Services that provide labor market information and employment information about in-demand industry sectors;
- Activities that help youth prepare for and transition to postsecondary education and training; and
- Other services necessary to ensure the success of the youth in employment and/or postsecondary education.

All youth must receive some form of follow-up services for a minimum duration of 12 months unless the youth declines to receive follow-up services or the youth cannot be located or contacted. The types of services provided and the intensity of services must be determined based on the needs of the youth. Follow-up services must include more than a contact or attempted contact, a service must be provided (if possible). Contacting an individual for securing documentation in order to report a performance outcome does not constitute a follow-up service.

Youth participants in follow-up shall be contacted at least once (1) per month. Follow-up may be conducted by telephone, in person, via e-mail (or other social media), or by written correspondence. Preference is for the follow-up to be through a medium that increases the probability of interaction with the participant and also increases the probability of continued contact.

Follow-up services require contact, interaction, and the provision of an acceptable follow-up service. As an example, a text to provide assistance with a job or work-related problem is follow-up. However, although sending a letter might be considered “following-up”, this is not considered a follow-up service since interaction and the provision of an actual follow-up service are required.

Documentation of Follow-up:

Minimum monthly contacts and services must be documented in the case notes and HireNetHawaii. Case notes must include narrative regarding all contacts and services. Additionally, appropriate activity codes for services provided to participants in follow-up must also be added in HireNetHawaii, as appropriate.

Exceptions to Follow-up:

Follow-up services may be discontinued if the participant indicates that they no longer need or want the follow-up contact. The participant must send an email or documentation in writing indicating the participant’s desire not to be contacted further. This must be documented in HireNetHawaii case notes.

Frequency of Data Entry into HireNetHawaii

All contractors and subrecipients are required to report individual participant data via HireNetHawaii, the State’s system of record, unless otherwise noted. The data, including individual applications for service, cannot be submitted more than 20-days in arrears.

OWDB prefers daily data entry, to ensure that the record is maintained according to federal requirements. Failure to perform a daily upload or data key entry can result in the following:

- Loss of Common Performance Outcomes.
 - Measurable Skills Gains

- Increase in errors during the data load process
 - Client already has been entered
 - Client has already auto-exited due to failure to submit continuing activity/services
- Data Change Requests that must be submitted to assist with errors received during the data load process. Data Change Requests will be denied if reason is due to simple failure to report by grant recipient.
- Loss of HireNetHawaii data quality for all partners.

Failure to Meet Submission Requirements:

If participant data are more than 20-days in arrears, OWDB will deny cash requests until the data have been submitted. The late submission of participant data is considered noncompliance with the Agreement entered into with the Oahu Workforce Development Board.

Document Scanning and Maintenance of Paperless Files:

Through the use of HireNetHawaii Document Scanning, subrecipients and contractors are no longer required to maintain hard paper files of participant information that are scanned into the HireNetHawaii system. Additionally, documents scanned into HireNetHawaii take place of hard files for verification, monitoring, and audit purposes. Once properly scanned into the HireNetHawaii system, paper records should be destroyed (i.e. shredded) and any documents that have been saved to a computer hard drive, desktop, removable media, Cloud storage, or in other environments shall be deleted. Such records shall only be maintained in the HireNetHawaii system unless a subrecipient chooses to maintain both an electronic file and a paper file.

Subrecipients and contractors must ensure that all scanned documents are inspected visually to ensure they are complete, clear, and easily read. Visual inspections for documents that are scanned into HireNetHawaii system must be complete, clear and legible as well as properly aligned.

Original content of a scanned document must not be altered or modified once it has been finalized. While scanning the original document is preferred, scanning legible verified documents provided by partners may serve as sufficient documentation. Documents uploaded into the HireNetHawaii system must always be current and kept current through program participation. In addition, case notes must identify the intent and purpose of all documents that are uploaded into the HireNetHawaii system.

Subrecipients and contractors must upload verification documents within HireNetHawaii as soon as documentation is made available and in accordance with eligibility guidelines and timeframes. Subrecipients and contractors must ensure that participant information is accurately reported in HireNetHawaii and that documents are uploaded for all fields that require verification.

Attaching Documents to Case Notes and/or Activities:

All documents pertinent to participant activities should be scanned through case notes and/or activities to support those entries. Subrecipient and contractor specific forms that aid in assessing the needs of the participant (e.g. supportive services determination, training eligibility determination, etc.) must be attached to the case notes of specific activities. Subrecipients and contractors must also attach documents to case notes and/or activities for documentation of services that provided under the appropriate activity (e.g. job referral verification, resume

assistance, etc.).

Electronic Signatures:

Document Scanning includes the addition of electronic signatures to any necessary documents or forms. Signatures may be captured within HireNetHawaii or using an electronic software such as Doc Signer or DocuSign. Subrecipients and contractors are encouraged to use electronic signatures for participant convenience. All scanners and signature pads purchased with WIOA funds must be documented as equipment and staff must observe the proper care and use of the equipment. This equipment must also be listed on the subrecipient or contractor Inventory List.

File Naming:

When uploading documents into the HireNetHawaii system, service providers must provide detailed names for the uploaded documents, and follow the directives as indicated in the Document Manager policy.

Procedures for Uploading Medical and/or Disability-Related Information

When uploading medical and/or disability-related information into HireNetHawaii, subrecipients and contractors shall ensure that these documents are password protected prior to uploading. Subrecipients and contractors shall ensure that these passwords are available only to staff and to the OWDB, should the need arise to review these documents.

Examples of medical and/or disability-related information include:

- Medical/health history
- Disability information
- Doctor's notes
- Disability benefits

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



Harrison Kuranishi
Executive Director

OAHU WORKFORCE DEVELOPMENT BOARD
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RICK BLANGIARDI
MAYOR



CHRISTOPHER K. LUM LEE
CHAIR

HARRISON KURANISHI
EXECUTIVE DIRECTOR

July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #18-25**

SUBJECT: POLICY ON RECORDS RETENTION AND ACCESS TO RECORDS

PURPOSE:

The purpose of this policy is to communicate the requirements for records retention and access to records applicable to all entities receiving funds under Title I of WIOA from the State of Hawaii.

BACKGROUND:

All entities will comply with the following requirements:

- a. 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule
- b. Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Section 185

POLICY:

OWDB and any subrecipients/subgrantees must retain all WIOA grant documents including program activity and financial records, supporting documents, participant files, statistical records and all other records pertinent to the grant sufficient to permit the preparation of required reports and the tracing of funds to validate the lawful expenditure of funds. Subject to the guidelines listed below, the minimum retention period for WIOA documents is documents is three years from the date of submission of the contract closeout documents and final expenditure report to the State.

GUIDELINES ON RECORDS RETENTION:

- If any litigation, claim or audit is started before the expiration of the three-year retention period, the records must be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
- If any program or financial monitoring is started before the expiration of the three-year retention period, the records must be retained until all findings involving the records have been resolved and final action taken.
- If the subrecipient/subgrantee is notified in writing by the OWDB, State, USDOL, federal cognizant agency for audit or indirect costs, or federal oversight agency for audit, the three-year retention period must be extended until all issues have been resolved and final action taken.
- If equipment was acquired with WIOA funds or transferred for use in the WIOA program, all pertinent records must be retained for three years after final disposition of the equipment with approval from the State.
- If program income is earned, the pertinent records must be retained for three years from the end of the subrecipient's/subgrantee's fiscal year in which the program income is earned.
- If indirect cost rate proposals and cost allocation plans are required to be submitted for negotiation to the subrecipient's/subgrantee's federal cognizant agency or the State, all documents pertinent to the indirect cost rate computations or proposals, cost allocation plans, supporting documents and similar computations of chargeback rates must be retained for three years starting from the date of such submission.
- If indirect cost rate computations and cost allocation plans are **not** required to be submitted for negotiation to the subrecipient's/subgrantee's federal cognizant agency or the State, all documents pertinent to the indirect cost rate computations, cost allocation plans, supporting documents and similar computations of chargeback rates must be retained for three years starting from the end of the fiscal year covered by the rate or plan.

GENERAL POLICY FOR ACCESS TO RECORDS:

The OWDB, State, USDOL, Inspectors General, and Comptroller of the United States, or any of their authorized representatives, must have the right to access to any documents, papers, or other records of the subrecipient/subgrantee which are pertinent to the WIOA grant, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to agency personnel for the purpose of interview and discussion related to such documents.

The right of access are not limited to the period of records retention but last as long as the records are retained.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to

this policy are made or a new policy is issued.

REFERENCES:

- 2 CFR Part 200.333-337, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule
- Title I of the Workforce Innovations and Opportunity Act (WIOA) of 2014, Section 185

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

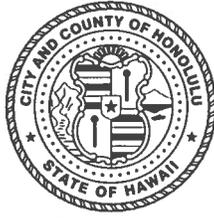


Harrison Kuranishi
Executive Director

OAHU WORKFORCE DEVELOPMENT BOARD
CITY AND COUNTY OF HONOLULU

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HARRISON KURANISHI
EXECUTIVE DIRECTOR

July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #19-25**

SUBJECT: CONTACT WITH SERVICE PROVIDER

PURPOSE:

The purpose of this policy is to establish guidance on communication practices between the service provider and The Oahu Workforce Development Board (OWDB) Workforce Innovation and Opportunity Act (“WIOA”) monitoring agency- Hawai'i Department of Labor and Industrial Relations (“DLIR”) Workforce Development Division (“WDD”) to require all communication between both parties to be facilitated through the OWDB.

BACKGROUND:

As local boards must have policies and procedures that may be more stringent than the State’s policies. The direct communication between DLIR departments WDD and WDC and the service provider poses the risk of inconsistent communication and misinterpretation of policies or programmatic guidance.

POLICY:

Generally, most communication originating from WDD intended to reach OWDB's service provider shall be routed through OWDB. Likewise, most communication originating from the service provider designed to reach WDD shall be routed through OWDB (see *Exceptions* below). All communications shall be made in writing- either via email or memorandum and sent to OWDB.

. EXCEPTIONS:

The following are approved exceptions to this policy:

- Social conversations;
- Discussions or scheduled operational meetings with OWDB staff;

- Discussions pursuant to attendance at OWDB committee or full board meetings; and
- Discussions pursuant to attendance at workforce development-related special events or gatherings.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

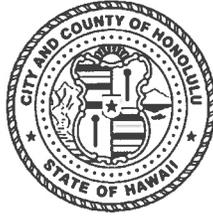


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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #20-25**

SUBJECT: POLICY ON TRANSFER OF FUNDS BETWEEN ADULT AND
DISLOCATED WORKER ALLOCATIONS

PURPOSE:

The purpose of this policy is to provide guidance regarding the transferring of funds between the Adult program and the Dislocated Worker program local formula allocations. Additionally, this policy is to outline the process to request the transfer of funds between the Adult and Dislocated Worker programs.

BACKGROUND:

In accordance with Section 133(b)(4) of the Workforce Innovation and Opportunity Act of 2014 and 20 CFR 683.130 the Local Workforce Development Board ("LWDB") is authorized to approve the transfer of up to 100% of funds between the Adult and the Dislocated Worker programs. Funds may not be transferred to or from the Youth program.

POLICY:

Objective for transferring of funds.

The ability to transfer funds between the Adult and Dislocated Worker programs is intended to provide greater flexibility to the service provider to meet the workforce needs of the City and County of Honolulu. The transfer of funds should be driven by a demonstrated need in a program, the ability to utilize the funds more effectively to achieve the objectives of the City and County of Honolulu, and the ability to better meet the needs of the customers.

Performance Outcomes.

The service provider is accountable for meeting the negotiated WIOA performance measures for the Dislocated Worker and Adult programs and for meeting enrollment and expenditure targets.

Transferring funds does not relieve the local area of its obligation to achieve any of the performance targets for that program.

GUIDELINES FOR TRANSFER REQUESTS:

- a. The transfer must not adversely impact an area's capacity to adequately provide appropriate services to individuals in need of such services provided by the program subject to the reduced funding.
- b. The transfer must not adversely impact the area's ability to achieve program performance measures established for the current or subsequent years.
- c. The Oahu Workforce Development Board must obligate, at a minimum, 80% of all funds budgeted to the receiving funding stream by the end of the first program year. Funds must be 100% expended by the end of the second program year
- d. Funds not eligible for transfer requests: Youth program funds; Adult or Dislocated Worker funds re-allocated by WDC; and other discretionary dislocated worker grants
- e. Funds may not be transferred between program years.
- f. Transfer requests may be submitted anytime during the first year of the life of the funds but must be submitted at least 60 days before the end of the second year.
- g. If a transfers includes 100% of its Dislocated Worker formula funds allocation, and a dislocation event occurs in the area, the request for Rapid Response funds will be considered on a case by case basis
- h. Program costs must not be shifted to or from another federal program to overcome fund deficiencies or avoid restrictions imposed by law, regulations or agreements
- i. All transfers of funds are subject to the priority of service requirement. Section 134(c)(3) (E) requires that priority of service be given to recipients of public assistance, other low income individuals, and individuals who are skills deficient. Additionally, TEGL 3-15 further emphasizes that local areas must give priority of services regardless of the levels of funds.

Transfer requests must include the following information:

- a. WIOA program year;
- b. the amount of the proposed transfer;
- c. the impact analysis describing the impact to the program from which funds are being moved and the impact to the program which will receive the funds

The impact analysis must include the following:

1. The situation necessitating the transfer, including local conditions, labor market, economic, etc.
2. How the funds transfer will impact participant levels in both programs.
3. A description of how the receiving program's participants will benefit from the transfer as well as how the impact on the contributing program will be mitigated, including how the remaining participants will be served.
4. The transfer's effect on current providers on training and other services
5. A description of the expected impact on WIOA performance outcomes for both programs.

To request the transfer, the following documents must be submitted:

(These forms are available at <http://labor.hawaii.gov/wdc/wia-docs/>)

1. Adult Program
 - Budget Detail A and related Budget Detail forms A-1 to A-5
 - Budget Detail B
 - Budget Information Summary
2. Dislocated Worker Program
 - Budget Detail A and related Budget Detail forms A-1 to A-5
 - Budget Detail B
 - Budget Information Summary
3. Narrative of the transfer request items stated previously.
4. Transfer requests must be signed by the Chair of the OWDB
5. Direct the request to:

**Bennette Misalucha, Executive Director
Workforce Development Council
830 Punchbowl Street, Room 417
Honolulu, HI 96813**

UNIFORM GUIDANCE:

Subrecipients and subgrantees must follow the federal cost principles in 2 CFR Part 200, Subpart E and Appendices III through IX, including any USDOL exceptions identified in 2 CFR Part 2900.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

REFERENCES:

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Sections 133(b)(4) and 134(c)(3)(E)
- TEGL 19-16, March 1, 2017
- 20 CFR Part 677 and Part 680
- 20 CFR 683.130
- 2 CFR Part 200, Uniform Administration Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule

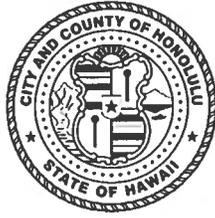


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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #21-25**

SUBJECT: ALLOWABLE COST

PURPOSE:

To establish policy guidelines with respect to allowable costs for programs funded in whole or in part under Title I of the Workforce Innovation and Opportunity Act (WIOA).

BACKGROUND:

All entities will comply with the requirements listed below:

- 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule

POLICY:

It is the policy of the Oahu Workforce Development Board (OWDB) that sub-recipients receiving WIOA Title I funds, awarded in whole or in part by OWDB, must establish a sound financial management system of controls that complies with the applicable uniform cost principles and the appropriate uniform administrative requirements. Therefore, sub-recipients must adhere to the Federal cost principles relevant to their organization.

Applicable cost principles, established regulations, and the terms of the sub-award agreement must be followed in determining the reasonableness, allowability, and allocability of costs. Only allowable costs may be charged to a WIOA grant. No WIOA grant may pay for more than its fair share of the expenses (allocability), which means that the sub-recipient must determine if the costs incurred by the organization are allowable based on established guidelines. All recipients and sub-recipients must maintain records that identify the-awarded funds These records must be maintained in accordance with Generally Accepted Accounting Principles, more commonly known as GAAP, which are applicable to all federally funded programs.

- WIOA subrecipients and subgrantees assume responsibility for administering the WIOA funds consistent with agreements, program objectives, regulations and policies;
- WIOA subrecipients and subgrantees will apply sound management practices for the efficient and effective administration of the WIOA funds awarded to their agency; and
- WIOA subrecipients and subgrantees have the responsibility for employing staff and facilities necessary to assure proper and efficient administration of the program.

Allowable costs must meet the followings general guidelines:

- The cost must be necessary and reasonable for performance of the award;
- The cost must be allocable to the award based on the relative benefits received;
- The cost must not be a general expense required to carry out the overall responsibilities of State and local governments, non-profit, or private for-profit organizations;
- The cost must be authorized under Federal, State, local laws or regulations;
- The cost must conform to any limitations or exclusions;
- The cost must be based on consistent and uniformly applied policies, regulations, and procedures;
- The cost must be adequately documented;
- The cost must be treated consistently through the application of generally accepted accounting principles and practices appropriate to the WIOA program;
- The cost must not be allocable to or included as a cost or used to meet cost sharing or matching requirements of any other federally funded program; and
- The cost must not be shifted to or from another federal program to overcome fund deficiencies or avoid restrictions imposed by law, regulations or agreements.

Subrecipients and subgrantees must follow the Federal Cost Principles at 2 CFR Part 200, Subpart E and Appendices III through IX, including any USDOL exceptions identified at 2 CFR Part 2900. Local area subrecipients must adhere to the limitations applicable to the WIOA formula grants as provided in the law, regulations or agreement. Certain limitations are listed below:

- a. Local Area Administrations – WIOA Section 128(b)(4)(A).
- b. Adult and Dislocated Workers
 - Transfers between adult and dislocated worker program – WIOA Section 133(b)(4);
 - On-the-job training – 20 CFR Part 680.700;
 - Pay-for-performance contracts – WIOA Section 134 (d)(1)(A)(iii);
 - Incumbent worker training – WIOA Section 134(d)(4)(A)(i); and
 - Transitional jobs for adults and dislocated workers – WIOA Section 134(d)(5).
- c. Youth
 - Out-of-school youth – WIOA Section 129(a)(4);
 - Work experience – WIOA Section 129(c)(1)(D); and
 - Pay-for-performance contracts – WIOA Section 129(c)(4).

ACTION:

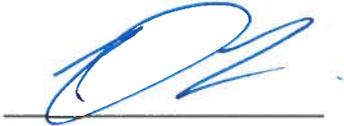
This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

REFERENCES:

Public Law (P.L.) 113-128 Secs.184 and 185; 20 CFR §683.235; 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; 2 CFR Part 2900 DOL Exceptions; State Compliance Policy (SCP) 3.1, 3.6 and 3.7

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

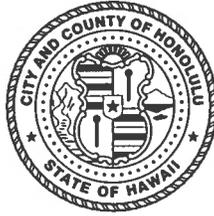


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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #22-25**

SUBJECT: COST CLASSIFICATION

PURPOSE:

To establish policy guidelines related to Cost Classification.

BACKGROUND:

The joint interim final rule implements for all Federal award-making agencies the final guidance Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) published by the Office of Management and Budget (OMB) on December 26, 2013. This rule must be incorporated into regulation and thus bring into effect the Uniform Guidance as OMB requires. Implementing this guidance will reduce administrative burden and risk of waste, fraud, and abuse. The result will be more Federal dollars reprogrammed to support the mission, new entities able to compete and win awards, and a more robust framework to provide critical services to American citizens and support the basic research that reinforces the United States economy.

POLICY:

Recipients of funds awarded under Title I of the Workforce Innovation and Opportunity Act (WIOA) must establish a sound financial management system of controls that comply with the applicable uniform administrative requirements, cost principles, and audit requirements. Recipients of WIOA Title I funds are responsible for the efficient and effective administration of awards by applying sound management practices and in a manner consistent with the General Accepted Accounting Principles. There are only two cost categories for the WIOA Title I grants. These categories are:

- Program Costs

- Administration Costs

While there are only two cost categories, the number of reporting categories may be more significant. Thus, the number of necessary cost objectives increases. The reporting formats for WIOA Title I programs indicate that an organization must also report program income, both earned and expended and the non-Federal costs of each program. Grantees should carefully review their systems for charging costs to ensure that all the cost activities may be adequately accounted for and that the costs reported on the applicable quarterly Federal expenditure reports (e.g., Quarterly Financial Status Report) are traceable to both the accounting system and source documentation.

Cost Classification

Cost classification is described as the process used to assign allowable costs to the benefiting cost objectives in the grantee's general ledger. Every cost expended for allowable WIOA grant activity must be traceable through the accounting system to the source documentation that supports all expenditures and to the data provided on required financial reports.

Cost Category - Program:

Costs directly related to the provision of workforce investment activities that are not defined as administrative.

Allowable costs by function include, but are not limited to the following:

1. Personnel and related non-personnel costs for individuals directly engaged in providing direct training and employment services;
2. Other personnel and related non-personnel costs of program managers, supervisors and/or coordinators, whose time has been properly allocated among benefitting cost categories;
3. Miscellaneous allowable costs including payment to vendors for goods or services procured for the benefit of program participants in the receipt of direct training services;
4. Payment related to on-the-job training programs, customized training, and work experience;
5. Participant payments: including supportive services required for participation, but which the participant cannot afford, and services needed to assist participants to secure and retain employment;
6. Tracking or monitoring of participants and performance information;
7. Employment statistics information, including job listing information, job skills information, and demand occupations;
8. Performance and program cost information on eligible providers of training services, youth activities, and appropriate education activities;
9. Local area performance information; and
10. General allowable costs incurred by the Oahu Workforce Development Board (OWDB) or the grant recipient for preparing program projects, agreements, and supervision of program staff.

Cost Category - Administrative:

Administrative costs are the allocable portion of necessary, reasonable, and allocable costs that are associated to specific functions, and which are not related to the direct provision of services to

participants and employers. These costs can be both personnel and non-personnel and both direct and indirect.

General allowable costs include, but are not limited to the following:

1. General administrative functions such as accounting;
2. Financial and cash management;
3. Procurement, contracting, negotiating activities;
4. Property management duties;
5. Personnel management, and payroll;
6. Audit functions and those duties associated with coordinating the resolution of findings originating from audits, monitoring, incident reports, or other investigations;
7. General legal services;
8. Performing oversight and monitoring related to WIOA administrative functions;
9. Costs of goods and services required for administrative functions of the program, including goods and services such as rental or purchase of equipment, utilities, office supplies, postage, and rental and maintenance of office space;
10. The cost of awards made to sub-recipient or vendor organizations for administrative services of the awarding agency (e.g., payroll service for staffing participants);
11. Travel costs incurred for official business in carrying out administrative activities or the overall management of the WIOA system;
12. Costs of information systems related to administrative functions, (e.g., personnel, procurement, purchasing, property management, accounting and payroll systems) including the purchase, systems development and operating costs of such systems.
13. Awards to sub-recipients or vendors that are solely for the performance of administrative functions are classified as administrative costs; and

Administrative Costs and Limitation:

WIOA Title I formula grants: Administrative costs are limited to a maximum of ten percent of the total program year allocation.

The cost classification structure must provide the capability to track costs for each of the two categories, Administrative and Program, and provide supporting documentation in support of how each cost is charged. Source documentation is the proof that costs reported are, allowable and allocable to the grant. Such items as cancelled checks, invoices, purchase orders, paid bills, payrolls, time and attendance records, and contract and sub-award documents, are some examples of acceptable source documentation. When supporting documentation cannot be provided for every dollar expended under the grant, a questioned cost will be flagged, which may result in a disallowed cost.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

REFERENCES:

Public Law (P.L.) 113-128 WIOA Sec. 184 and Sec. 185; 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards; 48 FAR Part 31; 20 CFR Part 683;

INQUIRIES:

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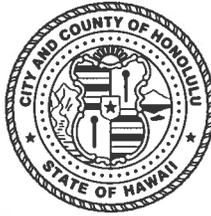


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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #23-25**

SUBJECT: BUDGET MODIFICATIONS

PURPOSE:

To provide guidance, set forth standards for sub-award budget Oahu Workforce Development Board sub-recipient budget modification process.

BACKGROUND:

Each recipient and sub-recipient of federal funds must expend and account for the federal award according to established laws and regulations. In addition, recipients' and sub-recipients financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions, and the tracing of funds to a level of expenditure adequate to establish that such funds have been used according to Federal statutes and regulations. Sub-recipient financial management systems must provide accurate, current, and complete disclosure of each sub-award or program's financial results, as required by 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

POLICY:

The Oahu Workforce Development Board (OWDB) is responsible for submitting all budget modification requests promptly. Proposed modifications will be considered only when necessary and for the benefit of the specific program or project funded. Flexibility is allowed within any sub-award budget category if the total category is not increased or decreased by more than 10%.

DEFINITIONS:

A modification is a formal process used to make changes to a sub-award agreement.

Sub-recipients are permitted to modify a sub-award budget within the established parameters to meet unanticipated program or project requirements. However, any modification shall be consistent with the terms and conditions of the sub-award agreement and the original intent of the approved and funded program or project.

Prior Written Approval

- a. Budget modifications exceeding 10% per category must receive prior written approval from The OWDB before they are executed. OWDB will accept requests for budget modifications for review on a quarterly basis unless an emergency or unforeseen immediate need arises.

- **Budget Modification Written Request**

Any proposed budget modification that results in a category increase or decrease of 10% or more must include the following:

- Modification requests must be submitted via a dated cover letter on organizational letterhead, signed by an authorized representative, containing the following:
- an explanation or rationale of the reason/justification for the proposed budget modification;
- An explanation or rationale regarding how the modification will benefit the project or program and an explanation of the projected outcome of the modification;
 - a. OWDB may request additional information or documentation as deemed necessary and appropriate.
 - b. OWDB shall conduct a programmatic and fiscal analysis of the allowability, reasonableness, and necessity of the budget modification. In writing, OWDB will notify the sub-recipient of the approval or disapproval of the modification request. Written approval of the sub-recipient's modification request must be obtained before the sub-recipient implements the modification.

Other Budget Modification Requirements:

- Sections including (Participant Training) and (Support Services) may be increased throughout the year via approved budget modifications and award increases but may not be decreased.
- Line items within Overhead sections, including (Travel), (Equipment), (Consultants Contracts), (Other Overhead), (Support Personnel), and (Support Fringe Benefits) may only be increased by approved funding increases or by decreasing another line item in one of the other Overhead sections. Line item budget modifications affecting the aforementioned Overhead sections must net to zero or show a net decrease.

- Sections (Personnel) and (Fringe Benefits) may only be increased through approved funding increases or by pulling funding from an Overhead line item. Any deviations from the above must be approved in writing by OWDB staff. OWDB reserves the right to mandate budget requirements, which may entail setting minimum and maximum requirements for any budgetary item or section.

Budget vs. Expenditure:

OWDB approval of the original budget and/or any modification(s) does not constitute approval of actual expenditures, actual expenditures must comply with all applicable Federal statutes and/or regulations, State and local policies.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

REFERENCES:

Public Law (P.L.) 113-128 WIOA Sec. 184 and Sec. 185; 2 CFR Part 200, 2900; One-stop Comprehensive Financial Technical Assistance Guide part II;

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



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**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #26-25**

SUBJECT: PERSONALLY IDENTIFIABLE INFORMATION (PII)

PURPOSE:

To address the security of Personally Identifiable Information (PII), both sensitive and non-sensitive, for services offered through Title I of the Workforce Innovation and Opportunity Act.

BACKGROUND:

The Workforce Innovation and Opportunity Act requires that recipients of WIOA Title I funds provide Personally Identifiable Information (PII) to access WIOA services. Federal law, OMB guidance, and Federal, State, and local policies require that PII and other sensitive information be protected.

POLICY:

All OWDB staff, contractors, grantees, sub-grantees, partner staff, and any other individuals or entities involved in the handling of personally identifiable information (PII) as a result of WIOA activities in the Workforce Development system in the City and County of Honolulu, including wage and education records, will protect PII by the law. FERPA (as amended), WIOA, and applicable Departmental regulations will be followed. OWDB staff, contractors, grantees, sub-grantees, employees, and any other individuals or groups involved in the receipt, handling, and/or protecting of PII and sensitive data developed, obtained, or otherwise associated with grantee funding MUST:

Annually (by July 1), sign a disclosure acknowledging the confidential nature of the data and agree to comply with safe and secure management of the data by federal and state requirements. (These disclosures must be kept on file with the One-Stop Operator for monitoring review at the request of the OWDB or DLIR). The following definitions will be applied to Personally Identifiable Information in the region.

DEFINITIONS

Personal Identifiable Information (PII): OMB defines PII as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Sensitive Information: Any unclassified information whose loss, misuse, or unauthorized access to or modification could adversely affect the interest or the conduct of Federal programs or the privacy to which individuals are entitled under the Privacy Act.

Protected PII and Non-Sensitive PII: The Department of Labor has defined two types of PII: protected PII and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.

1. **Protected PII** is information that, if disclosed, could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information and computer passwords.
2. **Non-sensitive PII** on the other hand, is information that, if disclosed by itself, could not reasonably be expected to result in personal harm. It is stand-alone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general educational credentials, gender, or race. However, depending on the circumstances, a combination of these items could be categorized as protected or sensitive PII.

PII should only be accessible to staff who need it in an official capacity to perform their responsibilities under WIOA. Staff must not extract information from data sources for personal use or any other reason.

PII will be processed to protect the confidentiality of the record and documents and to prevent unauthorized access. PII will be retained for the required period, as per ETA guidelines or the State of Hawaii, whichever is more stringent, and then destroyed.

The American Job Centers' staff, who provide services under Title I of WIOA, shall sign a release annually acknowledging their use of PII for grant purposes only and their intent to protect all PII from unauthorized users. All partners, contracts, and other relevant parties will be notified of this policy.

As part of the WIOA orientation, applicants and participants will be asked to sign an authorization to release information to listed parties, which the participant may revoke by submitting a written request.

Contractors/partners/grantees should have standard operating procedures in place to address the protection of PII.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

REFERENCE:

- TEGL No. 39-11; Federal Information and Security Management Act (Title III of the E-Government Act 2002); OMB M-06-15, and M-06-19; Executive Order 13402; Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. § 1232g; 34 CFR Part 99

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



Harrison Kuranishi
Executive Director

OAHU WORKFORCE DEVELOPMENT BOARD
CITY AND COUNTY OF HONOLULU

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RICK BLANGIARDI
MAYOR



CHRISTOPHER K. LUM LEE
CHAIR

HARRISON KURANISHI
EXECUTIVE DIRECTOR

July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #27-25**

SUBJECT: WIOA Adult & Dislocated Worker Work Experience Policy

PURPOSE:

To provide policy direction and guidance for the implementation of Work Experiences (WEXs) for WIOA eligible Adults and Dislocated Workers as an individualized career service within Career Services. WIOA provides for a workforce system that is job-driven. The WEX program provides work experience to assist individuals in establishing a work history, demonstrate success in the workplace, and develop skills that lead to stable employment.

BACKGROUND:

WIOA provides for a workforce development system that is accessible to all job seekers and employers, that is customer-centered, and where training opportunities are job-driven. WIOA is designed to put emphasis on activities and services that foster and promote access to better employment opportunities, training, educational, and support services to succeed in the current labor market and to match employers with the skilled workforce they need to compete in the current global economy.

Work-based training services or activities foster a great opportunity for increased business engagement and greater industry partnerships as these types of training allow employers to train their employees while continuing to be productive members of their workforce. The local workforce development system continues to promote the implementation of work-based initiatives that meet the highest levels of accountability, performance, and quality in preparing adults and dislocated workers for the current labor market.

POLICY:

A Work Experience (WEX) opportunity may be provided as an individualized career service to enrolled Adults and Dislocated Workers who have met the priority of service requirements. Work experience is defined as “a planned”, structured learning experience that takes place in the workplace for a limited period of time that contributes to the achievement of the participant’s

employment goal(s). The Work Experience workplace (WEX site) may be in the private-for-profit sector, the non-profit sector, or the public sector. An internship or work experience may be paid or unpaid, as appropriate. A WEX is not designed to replace an existing employee or position. Wages or Stipends are provided by the WIOA service provider and paid directly to the participant developing an employer/employee relationship between the service provider and the WEX participant. Labor standards apply in any WEX where an employee/employer relationship exists, as defined by the Fair Labor Standards Act. Employers are not monetarily compensated

GUIDELINES:

A Work Experience (WEX) may consist of:

- WEXs must provide a planned and structured learning experience that will contribute to the achievement of the participant's employment goals through a measurable training component.
- Designed to assist individuals to establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment.
- WEX agreements must be signed by all parties prior to the start of the WEX.
- A single WEX Agreement may be written for group training with a single training site provided the working conditions, job description, training plan, wage rates and terms of the Agreement are the same for all participants covered by the Agreement.
- WEX agreements may be modified. All modifications must be in writing and signed by all parties prior to the effective date of the modification. Verbal modifications of WEX agreements are not valid.

WEX Funding/Duration Limits:

- WEXs are subject to a maximum duration of six months.

WEX Monitoring:

- WIOA program staff must ensure regular and on-going monitoring and oversight of the WEX. Monitoring may include on-site visits and phone/email communication with the employer/trainer and participant to review the participant's progress in meeting training plan objectives. Any deviations from the WEX agreement should be dealt with promptly.
- WIOA program staff must visit each site for compliance prior to placing an intern.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

REFERENCE:

- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014
- WIOA Final Rule; 20 CFR Parts 676,677, and 678

- Training and Employment Guidance Letter (TEGL) 19-16

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

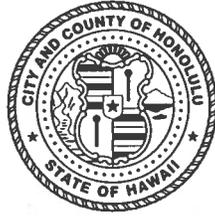


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**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #28-25**

SUBJECT: WIOA PRIORITY OF SERVICES

PURPOSE:

The purpose of this instruction is to transmit updates to the Priority of Service Policy.

BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) has established a priority requirement for funds allocated to a local area for individualized career and training services. Priority shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of career and training services. Under WIA, career services were identified as core and intensive services, and participants would progress through each level of service to eventually receive training. WIOA clarifies that individuals receiving services in one-stop centers must obtain the services necessary to assist them in meeting their job search goals. It does not require a fixed sequence of services that may not be necessary to serve the individual effectively.

POLICY:

Adults who receive services from WIOA-funded staff beyond self-service and information must be determined eligible, enrolled, and considered a participant for WIOA Title I services. Individualized career services and training services must be given on a priority basis, regardless of funding levels, to:

First Priority: Veterans and eligible spouses who are low-income, include recipients of public assistance, or who are basic skills deficient;

Second Priority: Low-income Individuals, to include recipients of public assistance, or basic skills deficient;

Third Priority: Veterans and eligible spouses who are not low-income, or are not recipients of

public assistance, and are not basic skills deficient; and

Fourth Priority: Individuals outside of the groups given priority.

Definitions

Low-income Individual:

An individual who meets any one of the following criteria satisfies the low-income requirement for WIOA Adult services:

- Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through SNAP, TANF, or Supplemental Security Income (SSI), or state or local income-based public assistance;
- Receives an income or is a member of a family receiving an income that, in relation to family size, is not in excess of the most recent Family Income Guidelines issued via LWDA Instruction;
- Is a homeless individual as defined in the McKinney-Vento Homeless Assistance Act or the Violence Against Women Act of 1994; or
- Is an individual with a disability whose own income meets the income requirement above, but who is a member of a family whose income does not meet this requirement.

Basic Skills Deficient:

WIOA defines basic skills deficient as an adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the participant's family, or in society. OWDB further defines basic skills deficient as an individual who meets any one of the following indicators:

- Lacks a high school diploma or equivalent; or
- Scores 8.9 or below on the Test for Adult Basic Education (TABE) or
- Is enrolled in Title II adult education for English as a Second Language (ESL).

It is expected that basic skills deficiency will be determined using an objective, valid, and reliable assessment, such as the indicators listed above. However, when a formal evaluation is not available or practical, case manager observations, customer acknowledgment, and documented case notes are acceptable. (Example: A case manager may observe that the adult is experiencing difficulty in reading or filling out an application form or has poor English language skills and may be appropriate for ESL. However, an individual should not be determined as basic skills deficient merely because they lack soft skills or the occupational skills needed for a particular job.) WIOA Title I funds cannot be used for assessing basic skills deficiencies before eligibility certification. Further, if not already a program participant, the use of funds for assessment will constitute enrollment in the program.

Documentation Requirements:

It is beneficial to capture all applicable priority of service categories to reflect efforts in serving those most in need. Additionally, these characteristics are likely to have a positive impact on future performance negotiations as the statistical adjustment model is implemented. Therefore, all applicable priority of service criteria should be recorded in HireNetHawaii, and the documentation required for each criterion recorded must be maintained in the participant's case

file.

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.

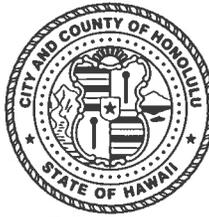


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**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #29-25**

SUBJECT: 2025 LOWER LIVING STANDARD INCOME LEVEL GUIDELINES

PURPOSE:

The purpose of this bulletin is to provide the 2025 Lower Living Standard Income Level (LLSIL) Guidelines

BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) Section 3 (36)(A) sets forth criteria for local areas to determine whether a person is a low-income individual and is eligible to participate in the WIOA Title I programs. The criteria include two sets of data:

1. the Poverty guidelines published by the U.S. Department of Health and Human Services (HHS) and
2. LLSIL determined by the U.S. Department of Labor (USDOL).

Individuals whose annual income level is less than 70 percent of the LLSIL are eligible for WIOA Title I programs. Employed workers whose annual income level is less than 225 percent of the LLSIL are eligible for training services. The USDOL revises the LLSIL Guidelines annually to reflect the cost-of-living increases. The USDOL's 2025 LLSIL was published by the Federal Register, Vol. 90, No. 91, on May 13, 2025. The HHS' update of the poverty guidelines was published in the Federal Register, Vol. 90, No. 11, on January 17, 2025.

POLICY:

WIOA Partners should use these updated guidelines for determining program eligibility and services.

PROCEDURES:

When determining an individual's WIOA eligibility based on low-income status as defined in

WIDA Section 3(36(A), service providers must use the higher of income guidelines issued by the Poverty Guidelines (Attachment 1) or 70 percent of the LLSIL (Attachment 2).
The Program Year (PY) 2025 chart for 225 percent of the LLSIL is intended to determine eligibility for training of employed workers. (Attachment 2)

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



Harrison Kuranishi
Executive Director

Attachment 1: 2025 Poverty Guidelines for Hawaii
Attachment 2: 2025 Hawaii 70% and 225% LLSIL Guidelines

2025 POVERTY GUIDELINES FOR HAWAII

Persons in family/household	Poverty Guideline
1	\$17,990.00
2	\$24,320.00
3	\$30,650.00
4	\$36,980.00
5	\$43,310.00
6	\$49,640.00
7	\$55,970.00
8	\$62,300.00

For Families/households with more than 8 persons, add \$6,330 for each additional person.

*The poverty guidelines updated periodically in the **Federal Register** by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2).

Attachment 2

Person in family/household	HONOLULU	NEIGHBOR ISLANDS
1	\$17,598	\$19,465
2	\$28,827	\$31,898
3	\$39,580	\$43,785
4	\$48,855	\$54,050
5	\$57,654	\$63,783
6	\$67,430	\$74,593
For each additional family member add2	\$9,776	\$10,810

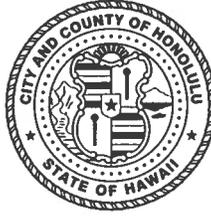
Person in family/household	HONOLULU	NEIGHBOR ISLANDS
1	\$56,565	\$62,566
2	\$92,660	\$102,528
3	\$127,222	\$140,738
4	\$157,034	\$173,734
5	\$185,317	\$205,018
6	\$216,740	\$239,762
For each additional family member add3	\$31,423	\$34,744

2 For families larger than six persons, an amount equal to the difference between the six-person and the five-person family income levels should be added to the six-person family income level for each additional person in the family.
3 For families larger than six persons, an amount equal to the difference between the six-person and the five-person family income levels should be added to the six-person family income level for each additional person in the family.

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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD
WORKFORCE INNOVATION AND OPPORTUNITY ACT
POLICY #30-25**

SUBJECT: OWDB STAFF COMMUNICATION POLICY

PURPOSE:

The purpose of this policy is to provide guidelines with contacting Oahu Workforce Development Board (OWDB) staff after hours.

POLICY:

The Oahu Workforce Development Board is available to the public from 7:45 a.m. to 4:30 p.m., Monday through Friday. During this period, the staff is available to communicate with the public, Board members, and all interested parties.

All OWDB staff fall under the Hawaii Government Employees Association (HGEA). Working after hours can raise questions about their rights, compensation, and workplace policies.

Hawaii law requires non-exempt employees to be paid one and a half times (1.5 times) their regular rate of pay for all hours worked over 40 in a single workweek.

After hours, please get in touch with the Oahu Workforce Development Board Executive Director at 808-927-6628.

Exceptions:

- Appointments or previously scheduled
- Emergencies

ACTION:

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

INQUIRIES:

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or h.kuranishi@honolulu.gov.



Harrison Kuranishi
Executive Director