



November 20, 2023

# **WIOAPL 23-01 (Implementation of Workforce Development Services Under the Quality Jobs, Equity, Strategy, and Training (QUEST) Round One Disaster Recovery National Dislocated Worker Grants (DWGs))**

## **Workforce Innovation and Opportunity Act Policy Letter No. 23-01**

**TO:** Workforce Innovation and Opportunity Act Local Workforce Development Boards Directors, Fiscal Agents, and OhioMeansJobs Center Operators

**FROM:** Matt Damschroder, Director

**SUBJECT:** Implementation of Workforce Development Services Under the Quality Jobs, Equity, Strategy, and Training (QUEST) Round One Disaster Recovery National Dislocated Worker Grants (DWGs)

**ATTACHMENTS:**

Attachment A: Glossary of QUEST DWG grant terms

Attachment B: Programs and occupations approved for QUEST-funded training

**I. Purpose**

To define participant eligibility, allowable services, and other policy parameters to enable participating local workforce development areas (local areas) to implement and deliver QUEST 1 grant services.

**II. Effective Date**

Immediately

**III. Background**

The COVID-19 pandemic has had substantial impacts on the health and prosperity of the nation, its people, and its businesses. Populations experiencing especially harmful impacts include women, immigrants, lower-wage workers, people of color, people with disabilities, individuals who were formerly incarcerated, and other workers from historically marginalized communities. Individuals living in rural communities that lack broadband connectivity were also vulnerable because many were unable to work, attend school or training, or access telehealth services remotely from their homes, and were therefore limited in their ability to maintain social distancing.

Recovery from the pandemic requires strength and resilience in industries critical to our economy's stability and growth, such as the broadband and telecommunications industries. Efforts to expand high-speed connectivity into rural communities will require substantial increases in the number of workers available with the skills to construct cell phone towers, install utility lines and fiber-optic wires, and deploy and manage wireless networks.

To address the current shortage of workers in telecommunications and broadband employment, the Ohio Department of Job and Family Services (ODJFS) applied for and received a \$9 million discretionary QUEST National Dislocated Worker Grant (DWG).

This time-limited grant will be used to:

- Launch regional industry sector partnerships known as Nodes under the leadership of a four-year university to implement training programs that develop broadband and 5G skills; to recruit potential trainees and workers into broadband career pathways; and to provide workforce development services to eligible individuals seeking entry into broadband occupations;
- Provide training that builds the skilled workforce in professions that can impact the availability of high-speed internet connectivity in rural communities;
- Develop and implement a statewide outreach campaign to educate students, job seekers, and the public about the high-quality jobs available in the broadband and telecommunication industries;
- Ensure the timely delivery of appropriate, necessary career, training, and supportive services to eligible participants, including individuals from historically marginalized populations and workers who have been impacted by the COVID-19 pandemic; and
- Assist broadband employers in recruiting and hiring the workforce needed to build a best-in-class broadband network and to ensure statewide access to high-speed internet connectivity.

#### **IV. State Requirements**

As the state workforce agency and grantee, ODJFS shall:

- Submit grant applications, modifications, quarterly reports, and other communications to the Department of Labor (DOL) on behalf of the local areas;
- Assign a project manager to serve as the point of contact and coordinator of grant related resources and information;
- Review and approve implementation plans and budgets submitted by the regional sector partnerships;
- Manage grant funds including the determination of sub-award amounts;
- Manage incremental funding to local areas and potential revisions to such awards to address underspending, ensure maximum investment of the available resources, and take action designed to ensure ODJFS fully invests the available grant funds during the QUEST performance period;
- Provide technical assistance to local areas, regional sector partners, and other stakeholders on the terms and conditions of the QUEST grant.

#### **V. Local Workforce Development Area Requirements**

The QUEST grant is a national Disaster Recovery Dislocated Worker grant issued to participating local areas under the authority of the WIOA subgrant agreement between ODJFS and each local area. Therefore, local areas must implement the grant-funded services and activities in accordance with the terms and conditions of the WIOA subgrant agreement, along with the requirements found in this policy letter.

##### **A. Regional Sector Strategies (or Nodes)**

Pursuant to implementation of the QUEST grant, a regional broadband sector partnership (or Node) will be established in each JobsOhio region. Each Node must include a four-year university serving as the administrative entity, a community college, a community action agency, and at least one local area able to provide QUEST-funded services to eligible participants. Each Node must submit a budget and implementation plan describing the service design, current or planned broadband training programs in the region, planned number of individuals who will receive broadband training, and other details for implementing the QUEST grant.

The portion of the Node's planning budget earmarked for workforce development services will be sub-awarded by ODJFS to the local area(s) participating in the Node. Participating local areas must assist the other Node partners in developing and updating the plan and budget, including the budget for QUEST-funded workforce services to be provided to eligible participants.

As changes to the local plan occur, such as the provision of new services not identified in the plan or significant changes in the number of planned participants, local areas must work with the Node partners to submit a revised implementation plan to the ODJFS-designated project manager, explaining the changes as soon as possible, but no later than 30 days after each change.

##### **B. Eligible Participants**

The goal of Ohio's QUEST DWG is to enable individuals who have been adversely affected by the COVID-

19 pandemic and the social and economic inequities that the pandemic exacerbated, to enter, return to, or advance in high-quality jobs in the broadband industry. The activities of the QUEST DWG will yield improved individual and community resilience to the ongoing effects of the COVID-19 pandemic and enhance the ability of broadband providers to expand high-speed connectivity statewide.

Local areas shall ensure that individuals served under the QUEST grant have met all eligibility criteria, including those in 20 C.F.R. § 687.170 and WIOAPL 15-02.1 (Adult and Dislocated Worker Eligibility).

Individuals eligible to receive QUEST grant services must be one of the following:

1. A dislocated worker;
2. An individual temporarily or permanently laid off as a consequence of the COVID-19 pandemic;
3. A long-term unemployed individual; or
4. A self-employed individual who became unemployed or significantly underemployed as a result of the COVID-19 pandemic.

Note: Direct services such as career, training, or supportive services must be limited to the eligible participants above. Further, grantees should design and implement grant activities that prioritize services and outcomes for any underserved and historically marginalized populations that otherwise meet the eligibility categories above. ODJFS will select a community action agency (CAA) in each region to help the local area recruit individuals from marginalized populations that the CAA interacts with and to refer them to the local area for potential enrollment in QUEST-funded services and broadband training and employment.

Some of the QUEST grant's activities may also benefit other non-DWG populations. For example, cohort training to introduce QUEST DWG participants to broadband industry standards or working conditions may be offered to WIOA Adult program participants, with the costs charged entirely to the QUEST grant, if class size and seat availability permit.

### **C. Allowable Services and Activities**

In planning and implementing services under the QUEST grant, local areas should consider that the grant is meant to alleviate the devastating effects of the COVID-19 pandemic through:

- Career, training, and supportive services for eligible participants, aimed at increasing the number of qualified professionals in fields that can impact the lack of broadband connectivity in rural communities;
- Providing a full array of workforce services to eligible participants; and
- Increasing engagement with and support for broadband employers, to expand the number of workers entering careers in the broadband industry.

#### Career Services

Local areas will provide basic and individualized career services such as job search assistance, initial and specialized assessments of skill levels, career planning, and prevocational services as outlined in Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-08.1, Career Services for Adults and Dislocated Workers.

#### Training

This grant is aimed at providing eligible individuals with the skills needed to succeed in broadband and 5G careers. Attachment B to this policy lists occupations for which training is an allowable use of QUEST funding, and cites related instructional categories. These options were identified by the Ohio Broadband & 5G Sector Partnership. QUEST dollars may also be used for training in other occupations, if the case record shows that it leads to employment by a broadband or 5G employer and the activity is approved by the ODJFS project manager for QUEST. An example might be on-the-job training or Registered Apprenticeship carried out by a local telecommunications contractor.

QUEST participants may be co-enrolled in, and receive braided funding from, other workforce programs such as the Dislocated Worker program. Long-term training may be supplemented with WIOA formula funds if the individual is eligible for WIOA formula funding and the training extends beyond the QUEST grant period.

## Supportive Services

Grant-funded supportive services such as transportation, child care, and housing assistance may be provided to grant participants in need of such services. Local areas should review their policies to ensure that the types of supportive services needed by individuals seeking to enter broadband careers, such as work clothing that will enable them to function in harsh outdoor conditions, are authorized.

Also, local areas should ensure the array of services will increase the likelihood that participants from historically marginalized populations can successfully complete the training. These participants may require extensive help with barrier removal and financial support at levels not required by other population groups who are unaffected by cultural biases.

## Other Allowable Services and Activities

Services and activities may be delivered under the local area's existing policies applicable to dislocated workers, or the local workforce development board (local WDB) may opt to implement new or revised policies specific to the QUEST grant.

Examples of such policy revisions may include:

- Extending the length of training or increasing the maximum training funds available to participants who plan to enter occupations that can expand broadband access; or
- Permitting funding for transitional jobs to help participants with barriers or from historically marginalized populations to establish a work history, develop workplace skills, and enter or re-enter the workforce.

In addition to the allowable services for eligible participants identified above, local areas may use QUEST grant funds for other activities meant to expand the broadband workforce and assist the target populations in entering and succeeding in broadband careers, such as:

- Incorporating broadband-related work-based learning or entrepreneurial training in the program design for occupations listed in Attachment B;
- Assisting broadband employers in establishing Registered Apprenticeship training programs, including provision of funds for the related instruction (if allowable as occupational skills training) or funding for OJT as authorized in the local area policy; and
- Reviewing intake and eligibility policies and procedures to reduce delays in services and eliminate eligibility requirements not required by law, to enable the broadest participation in grant-funded services and to remove barriers that may hinder marginalized populations from accessing services.

Up to ten percent of the funds awarded to the local area may be used for administrative costs as defined in 20 C.F.R. § 683.215 that are associated with operating the grant.

## **D. Unallowable Services and Activities**

QUEST funds may not be used to pay for incentive payments to participants.

## **E. Subrecipients and Contractors**

Local areas may enter into subrecipient agreements or contracts with public entities, not-for-profit organizations, and private-for-profit entities. The determination of subrecipient or contractor status must be based on the considerations in 2 C.F.R. § 200.331.

Competitive procurement of a provider that meets the definition of a subrecipient is not required but is recommended when feasible, to increase the likelihood of obtaining the highest quality of services at the lowest cost.

When contractors are competitively selected, this must be done in accordance with federal, state, and local procurement rules. For-profit contractors and subrecipients may keep the profits earned from performance of grant activities. The amount of profit must be negotiated as a separate element of the overall price of the services, with consideration given to the complexity, risk, past performance, and industry profit rates in the surrounding geographical area for similar work.

Profits that are excessive or that are not justified using the aforementioned criteria will be disallowed and cannot be paid from grant funds.

## **VI. Reporting Requirements**

Local areas must report participants served under the QUEST grant in the state's designated case management reporting system under the special grant office created for the grant. Within 30 days of its occurrence, each participant enrollment, service, and activity must be entered into the case management reporting system special grant office section.

The outcomes of participants in the QUEST grant will not affect the local area's WIOA performance measures, unless the local area opts to co-enroll participants in local WIOA formula-funded programs.

To evaluate the quality and effectiveness of the Nodes, ODJFS, in partnership with the Ohio Broadband & 5G Sector Partnership, will determine additional performance standards, which may include periodic narrative reports or the need to enter trainee and outcome data in other reporting systems. Participating local areas will work with the other Node partners to comply with additional reporting mandates in the manner prescribed by ODJFS, using the designated reporting system(s).

DOL also may assess Ohio's QUEST grant implementation by carrying out an impact or outcome analysis, a cost/benefit analysis, or return-on-investment (ROI) study for example. ODJFS and its sub-recipients may therefore be required to collect data elements to aid the evaluation. If DOL chooses to assess Ohio's QUEST grant, the participating local areas must agree to:

- Make records available to the evaluator on QUEST participants, employers, and funding;
- Provide access to staff, participants, financial records, and other relevant individuals and documents; and
- Comply with evaluation procedures specified by the evaluator.

Local areas must request cash draws and report expenditures and other financial information using the State's designated financial reporting system, including the client tracking detail for participant-level direct service costs.

## **VII. Monitoring**

Local areas that issue subawards must assess the risk of non-compliance of each subrecipient and develop monitoring policies outlining the procedures, frequency, and methods for assuring that grant-funded services carried out by the subrecipient are compliant and for resolving any findings of non-compliance.

ODJFS program and fiscal monitors will examine the local area's implementation of QUEST grants, including participant file review and verification of actual expenditures, during the regular onsite review of the local area for compliance with all applicable federal and state laws, regulations, and guidance letters including this guidance letter. Any findings will be addressed through the state's monitoring resolution process.

## **VIII. Technical Assistance**

For additional information or to request technical assistance, contact the project manager designated by the ODJFS Office of Workforce Development to oversee implementation of the QUEST grant.

## **X. References**

<https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf>

[USDOL, Training and Employment Guidance Letter No. 2-22: QUEST Disaster Recovery National Dislocated Worker Grants Funding Announcement \(July 5, 2022\).](#)

2 C.F.R. § 200.331.

20 C.F.R. § 683.215.

20 C.F.R. § 687.170.

[ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-02.1, Adult and Dislocated Worker Eligibility \(October 1, 2020\).](#)

[ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-08.1, Career Services for Adults and Dislocated Workers \(June 6, 2017\).](#)

[ODJFS, Workforce Innovation and Opportunity Act Policy Letter No.15-11.3, Use of Individual Training Accounts \(September 27, 2021\).](#)

[The Ohio Broadband Strategy](#)

[Strengthening Ohio's Broadband and 5G Workforce](#)

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