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June 9, 2016

ALL COUNTY LETTER 16-51

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALWORKS PROGRAM SPECIALISTS
ALL COUNTY WELFARE-TO-WORK COORDINATORS
ALL CONSORTIA PROJECT MANAGERS
ALL COUNTY REFUGEE COORDINATORS
ALL CALFRESH COORDINATORS
ALL CHILD CARE COORDINATORS
ALL TRIBAL TANF ADMINISTRATORS

SUBJECT: WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA):
MANDATORY PARTNERSHIP REQUIREMENTS FOR CALIFORNIA
WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS
(CalWORKs) WITH AMERICAN JOB CENTERS OF CALIFORNIA

REFERENCES: [PUBLIC LAW \(P.L.\) 113-128](#) (WIOA STATUTE) AND [DRAFT CALIFORNIA STATE WIOA PLAN](#)

The purpose of this letter is to provide guidance to County Welfare Departments (CWDs) regarding the mandatory partnership under WIOA with their local American Job Centers of California (AJCCs), which were formerly called One-Stop Career Centers. The WIOA, which replaced the Workforce Investment Act, passed congress with overwhelming bipartisan support and became effective July 1, 2015. The WIOA requires Temporary Assistance for Needy Families (TANF) programs to partner with AJCCs. The mandatory partnership requires access to TANF services in AJCCs, sharing TANF funds, and completing a Memorandum of Understanding (MOU) between Local Workforce Development Boards (Local Boards) and TANF programs.

Overview

The WIOA promotes collaboration and coordination across public agencies and funding sources to assist low-skilled adults and youth to obtain marketable skills and recognized

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

credentials to help them enter and progress in the workforce. This is achieved via “Career Pathways,” defined in the WIOA statute at [P.L. 113-128, Section 3\(7\)](#), which is centered on connecting education, training and other services with in-demand occupations and the needs of employers.

Key Information

- TANF programs provide access to services at AJCCs.
- The CWDs are required to partner with Local Boards and document these arrangements via MOUs.
- The CWDs do not have increased funding obligations under WIOA.
- TANF cost-sharing under WIOA (to be set-up by December 31, 2017) can be achieved in various ways, including through access to TANF services at AJCCs.
- Cost sharing can be met through expenses for shared services, space, equipment, and staff at AJCCs.

Following is detailed information regarding the partnership between WIOA and TANF:

Timeline

The timeline for WIOA requirements to be completed by Local Boards and their partners, including the CWDs, is below:

- June 30, 2016: Local Boards complete Phase I of the MOUs (Service Coordination).
- June 30, 2017: Local Boards ensure that AJCC operators and career services providers are in place (including access to CalWORKs services).
- December 31, 2017: Local Boards complete Phase II of the MOUs (Resource Sharing).
- July 1, 2018: Local WIOA Plans go into effect.

TANF program requirements

There are five roles and responsibilities for TANF programs as indicated in the WIOA statute at [P.L. 113-128, Section 121\(b\)\(1\)\(A\)](#) (for more detailed information, see “Roles and Responsibilities” immediately following this section):

1. Provide access to TANF programs or activities through an AJCC.
2. Assign a portion of TANF program funds for AJCC operations.
3. Enter into an MOU with the Local Board regarding the operation of the AJCCs.
4. Participate in the operation of the AJCCs consistent with the MOU.
5. Potentially provide representation on the Local Board.

Roles and Responsibilities

#1 - Provide access to TANF programs or activities through AJCCs:

- At a minimum, initial CalWORKs intake and eligibility services (e.g., help with applications) and information about the availability of assistance and non-assistance benefits must be available at AJCCs.
- This minimum requirement can be met by CalWORKs programs by providing **access to CalWORKs services** in at least one local AJCC, which can be achieved by one or more of the following:
 1. **Co-location** of at least one **CalWORKs staff** member at AJCCs to provide assistance and information regarding intake and benefits;
 2. **Cross-trained AJCC staff** who can assist workforce program participants with accessing CalWORKs services and information; and/or
 3. **Virtual access to CalWORKs services**, which means real-time access to CalWORKs staff from the AJCC, such as dedicated phone lines or video conferencing—and not, for example, a computer kiosk that merely connects to the CWD’s website.
- The CWDs may provide additional services beyond the minimum requirement for access to TANF services at the AJCCs.

#2 - Use TANF funds for AJCC infrastructure and to fund career services:

- The sharing of costs for infrastructure and other funds will be included in the MOU developed by the Local Board in partnership with the CWD.
- The CWD can meet the requirements of funding AJCC **infrastructure** by sharing costs related to the **access of CalWORKs services** as agreed to in the MOU.
 - Infrastructure is defined in the WIOA statute at [P.L. 113-128, Section 121\(h\)\(1\)\(A\)](#) as the **non-personnel** costs that are necessary for the general operation of AJCCs, including the rental costs of the facilities, the costs of utilities and maintenance, equipment, and technology to facilitate access to AJCCs, including the center’s planning and outreach activities.
 - The CWDs that have existing arrangements for access to CalWORKs services that meet at least the baseline (minimum) requirements of access will base their infrastructure funding on those existing arrangements.
 - The CWDs that need to implement access to CalWORKs services in order to meet at least the baseline requirements for providing access to CalWORKs services in AJCCs will need to determine the amount of funding required to maintain access.
 - Baseline requirements can be met by continuing or implementing one of the strategies for providing access to CalWORKs services in “Role and Responsibility #1” in at least one local AJCC.
 - **The infrastructure funding requirement can be met using cash and non-cash (in-kind) contributions.**
 - Non-cash contributions may include, for example, equipment provided by the CWD for use by AJCC and CWD staff.

- More details about funding contributions are available on the Department of Labor’s (DOL) [WIOA frequently asked questions webpage](#).
- **Funds for career services** are funds or non-cash resources used to pay costs as described in the WIOA statute at [P.L. 113-128, Section 121\(i\)\(1\)](#).
 - **Career services** are defined in the WIOA statute at [P.L. 113-128, Section 134\(c\)\(2\)](#) and are listed below with examples of matching CalWORKs services in **bold**:
 1. Provision of information relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including child care and Medicaid (**orientation, appraisal, Family Stabilization**).
 2. Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs (**appraisal, assessment, learning disabilities screening**).
 3. Job search and placement assistance (**job search, subsidized employment**).
 4. Diagnostic testing and use of other assessment tools (**appraisal, assessment, learning disabilities screening**).
 5. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals (**appraisal, assessment**).
 6. 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 (**WTW 2/WTW plan, supportive services**).
 7. Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training (**job readiness**).
 8. Internships and work experiences that are linked to careers (**subsidized employment, unpaid work experience, community service**).
 9. English language acquisition and integrated education and training programs (**adult basic education, job skills training directly related to employment**).
 - **Career services** are services provided to WTW participants who are also receiving WIOA services through an AJCC, regardless of where the services are provided (e.g., CWD office or AJCC).
 - Non-cash, or in-kind, contributions may be resources such as space, equipment, and/or staff to deliver shared services.
 - Following is an example of established WTW costs that meet the Other Funds requirement under WIOA:

- A participant receives an appraisal as a part of the standard WTW flow.
- Based on the appraisal, the participant is referred to the AJCC for job readiness services.
- The CWD has costs related to the appraisal and job readiness, which meet the career services funding requirement of WIOA.
- No funds are exchanged for the appraisal; if needed, the CWD reimburses the AJCC for job readiness services based on their ongoing agreement.
- The CWDs do not need to provide all of the WIOA career services in partnership with the AJCC system.

#3 - Enter into an MOU with the Local Board relating to the operation of the AJCC system:

- As indicated in the California Employment Development Department's [Workforce Services Directive 15-12](#) (January 20, 2016), Local Boards are responsible for entering into a MOU describing the operations of the entire AJCC delivery system and the responsibilities of each partner. Local Boards are the lead on MOU negotiations as well as how AJCC services are delivered within their local workforce development area. **The three major components each MOU must address are shared customers, shared services, and shared costs.** The MOU development process will take place in two phases:
 - **Phase I, Service Coordination:** Local Boards will work with all required partners in their local area to develop an agreement regarding the operations of the local AJCC system as it relates to shared customers and services. Phase I of each MOU must be completed no later than **June 30, 2016.**
 - **Phase II, Shared Resources and Costs:** Local Boards will build upon the agreements established in Phase I through the sharing of resources and costs. Phase II of each MOU must be completed no later than **December 31, 2017.**
- MOUs must be reviewed at least once every three years and updated as needed to ensure appropriate funding and delivery of services as explained in the WIOA statute at [P.L. 113-128, Section 121\(c\)\(2\)\(A\)\(v\)](#).
- **MOUs must address participants' confidentiality:**
 - The [state WIOA plan](#) explains that agreements between partners must ensure all relevant state and federal privacy requirements are met, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Family Educational Rights and Privacy Act (FERPA) requirements, and all other relevant state and federal laws.
 - Contractors for CalWORKs are required to adhere to the same confidentiality requirements as CalWORKs programs and staff:

- The CDSS Manual of Policies and Procedures section [19-004.2](#) states that contracts (MOUs) with public or private agencies which involve confidential information shall contain provisions to insure that the confidential information will be used in accordance with the restrictions found in [Welfare and Institutions Code Section 10850](#).

#4 – The CWDs participate in the operations of the AJCCs based on the MOU developed in partnership with the Local Boards:

This is achieved by the CWDs working with AJCCs on career services and Career Pathways for WTW participants in alignment with participants' WTW plans. Career services are described above and Career Pathways are described in the attachment to this letter.

#5 - Potentially provide representation on the Local Boards:

The CWDs have discretion on whether to provide staff to represent the county CalWORKs program on the Local Boards.

- The WIOA statute at [P.L. 113-128, Section 107\(b\)\(2\)\(D\)\(iv\)](#) states that Local Boards may, at their discretion, include representatives of public assistance agencies (i.e., the CWDs).

CDSS Role in Mandatory TANF-AJCC Partnership

The CDSS is working with the California Workforce Development Board (CWDB) and other partners by doing the following to support WTW participants (from the [state WIOA plan](#)):

- Promote the building of Career Pathways programs and partnerships for WTW participants, including participants at community colleges.
- Issue joint letter(s) and policy directives to communicate the requirements and benefits of partnership.
- Issue guidance communicating baseline federal rules for mandatory partnership at AJCCs (regarding funding, access to partners' services, etc.) to the CWDs and Local Boards.
- Identify models of TANF-AJCC partnerships that go beyond baseline federal expectations to provide best practices and improve client outcomes.
- Assess levels of partnership and WIOA compliance among CWDs and Local Boards.
- Provide support for and technical assistance to CWDs and Local Boards to facilitate Career Pathway programs specifically geared toward WTW participants.
- With the support of the California Community College Chancellor's Office (CCCCO), provide guidance to encourage AJCCs and CWDs to collaborate with community colleges on Career Pathway activities.

Refer to [appendix G](#) of the state WIOA plan to review the complete agreements between the CWDB and CDSS on Career Pathways, subsidized employment, and AJCC partnerships.

Tribal TANF

Unlike state TANF programs, Tribal TANF programs are not mandatory partners with AJCCs. Tribal TANF programs are not addressed in WIOA and do not have roles and responsibilities under WIOA. Indian and Native American Employment and Training Programs are discussed in the WIOA statute and regulations, but these programs operate under the DOL and are not related to Tribal TANF programs, though these programs may partner on workforce activities. On the DOL's [Indian and Native American Employment and Training Programs webpage](#), these programs are described as providing quality employment and training services to tribes, tribal organizations, Alaska Native entities, Indian controlled organizations and Native Hawaiian organizations serving unemployed and low income Native Americans, Alaska Natives and Native Hawaiians. Indian and Native American Employment and Training Programs do not have funding requirements for AJCCs' infrastructure.

Conclusion

WIOA is an opportunity for CWDs and AJCCs to build upon years of successful collaboration assisting WTW participants to become trained, employed, and self-sufficient. The process of implementing the mandatory CalWORKs-AJCC partnership is a flexible and dynamic opportunity for CWDs to expand and implement career services and Career Pathways with AJCCs for WTW participants. The mandatory requirements that need to be implemented by the CWDs are included in the main body of this letter. The attachment provides supplementary information, including an overview of WIOA, the state WIOA plan, Career Pathways, and performance measures.

If you have questions about this ACL or WIOA, contact your CalWORKs Employment Bureau county consultant at (916) 654-2137.

Sincerely,

Original Document Signed By:

TODD R. BLAND
Deputy Director
Welfare to Work Division

Attachment

c: CWDA

This attachment is a supplement to All County Letter (ACL) 16-51, for those interested in additional information about the Workforce Information and Opportunity Act (WIOA), including the purpose of WIOA, core programs, California's WIOA plan, Career Pathways, and performance measures. The mandatory requirements that need to be implemented by the CWDs are included in the main body of ACL 16-51 (the previous seven pages).

WIOA OVERVIEW

Introduction

The WIOA streamlines workforce programs and prioritizes services to job seekers with barriers to employment including individuals receiving public assistance, such as Temporary Assistance for Needy Families. The County Welfare Departments (CWDs), Local Workforce Development Boards (Local Boards; formerly Local Workforce Investment Boards), and American Job Centers of California (AJCCs; formerly One-Stop Career Centers) have worked together successfully for years to serve welfare-to-work (WTW) participants. The WIOA provides new opportunities and guidance to enhance and expand this relationship to benefit WTW participants and develop their Career Pathways, which provide educational and employment opportunities that lead to self-sufficiency. The WIOA retains much of the structure of the Workforce Investment Act, but with critical changes to increase coordination and alignment of workforce services among various programs.

Additional guidance about WIOA can be accessed at the California Workforce Development Board's (CWDB) [Plans/Policies webpage](#) and the Department of Labor's (DOL) [WIOA webpage](#).

Purposes of WIOA

The WIOA is administered by the federal Department of Labor (DOL) and Department of Education (ED) and has **six main purposes**, which are described in the WIOA Statute at [P.L. 113-128, Section 2](#):

1. Increasing access to and opportunities for the employment, education, training, and supportive services for individuals, **particularly those with barriers to employment**;
2. supporting the alignment of workforce investment, education, and economic development systems in support of a comprehensive, accessible, and high-quality workforce development system;
3. improving the quality and labor market relevance of workforce investment, education, and economic development efforts;
4. promoting improvement in the structure and delivery of services;
5. increasing the prosperity of workers and employers; and
6. providing workforce development activities that increase employment, retention, and earnings of participants and that increase post-secondary credential attainment and as a result, improve the quality of the workforce, **reduce welfare**

dependency, increase economic self-sufficiency, meet skill requirements of employers, and enhance productivity and competitiveness of the nation.

Core Programs

There are **six core programs** under WIOA at [P.L. 113-128, Section 3\(13\)](#):

1. Adult Program administered by the DOL under WIOA Title I;
2. Dislocated Worker Program administered by the DOL under WIOA Title I;
3. Youth Formula Programs administered by the DOL under WIOA Title I;
4. Adult Education and Family Literacy Program administered by the ED under WIOA Title II;
5. Wagner-Peyser Act employment services administered by the DOL, as amended by WIOA Title III; and
6. Vocational rehabilitation programs under the Rehabilitation Act Title I administered by the ED, as amended by WIOA Title IV.

Following are definitions under WIOA for Adults, Dislocated Workers, and Youth who need assistance with becoming employed. These are the core WIOA programs that CalWORKs directly works with:

- **Adults** are individuals who are age 18 or older needing assistance with employment.
- **Dislocated Workers** include individuals who have been terminated or laid off (or received a notice of termination or layoff) and are unlikely to return to a previous industry or occupation.
 - Dislocated workers may also have been self-employed but are now unemployed as a result of general economic conditions in the community.
 - Dislocated workers may also be displaced homemakers or spouses of a member of the Armed Forces on active duty who lost employment due to a permanent change in duty station.
- **Youth** are categorized as Out-of-School and In-School:
 - **Out-of-School Youth** include individuals **ages 16 through 24** who are not attending any school and who have one or more barriers to employment, such as having dropped out of school, a lack of basic skills, being a current or former foster care youth, and/or having a disability.
 - **In-School Youth** include **low-income** individuals **ages 14 through 21** who are attending school, and who have one or more barriers to employment, such as a lack of basic skills, homelessness, or being a current or former foster care youth.

The WIOA emphasizes services for out-of-school youth, as 75 percent of all WIOA funds directed to youth must be used to serve out-of-school youth. Due to the age range (16 through 24) of out-of-school youth and their need for employment and education, this population (when they have children) has considerable overlap with the CalWORKs WTW population.

STATE WIOA PLAN

The [state WIOA plan](#) was developed by the CWDB with partners, including the Department of Rehabilitation, the Department of Education, the CDSS, and the California Community College Chancellor's Office (CCCCO). The plan provides significant flexibility for the CWDs and Local Boards in developing partnerships and providing WIOA services. The plan was submitted to the DOL and ED in March 2016, and the plan is **effective July 1, 2016**. The Local Boards will need to develop local WIOA plans based on the state WIOA plan in coordination with local partners, such as the CWDs. The CWDB will issue guidance for local plans; information for and about Local Boards may be obtained on the CWDB's website at the [Local Boards webpage](#).

The CalFresh Employment and Training (E&T) program is discussed in chapter two of the [state WIOA plan](#). Although this program is not a mandatory partner with AJCCs like CalWORKs, the CWD's E&T programs may partner with AJCCs to enhance services to E&T participants. The agreements between the CWDB and CDSS are in [appendix G](#) of the state WIOA plan.

CAREER PATHWAYS

In the [state WIOA plan](#), the CWDB defines "Career Pathways," "career ladders," or "career lattices" as a series of positions, work experiences, or educational benchmarks or credentials with multiple access points that offer occupational and financial advancement within a specified career field or related fields over time. The state WIOA plan goes on to explain that Career Pathways are designed to facilitate incremental and progressive skills attainment over time, in clearly segmented blocks, so that participants progressing through the pathways obtain education or training services built on prior learning efforts.

The objective of Career Pathways is to provide a consolidated set of skills that have practical labor market value at each stage of the learning process. Key elements of successful pathway programs include the following:

- No pre-set sequence of services: Entry and exit points are based on participants' needs, as well as educational or skill levels, allowing participants at different skill levels to participate where appropriate.
- High degree of program alignment and service coordination among relevant agencies: e.g., CalWORKs, CalFresh, Community Colleges, AJCCs, Vocational Education providers, etc.
- Employer engagement to ensure that training and education are relevant to the labor market.
- **Effective service to populations with barriers to employment by providing services based on individual needs:**
 - Similar to the WTW flow and WTW plans, Career Pathways consist of elements such as appraisal/assessment, barrier removal, and a mixture of

education and work activities that assist participants with advancing skills to achieve self-sufficiency.

Detailed resources for Career Pathways are available through the DOL, ED, and the Administration for Children and Families (ACF) at the following links:

- DOL: [Career Pathways Toolkit: A Guide for System Development](#)
- ED: [Career Pathways: Approaches for the Delivery of Education, Training, Employment, and Human Services](#)
- ACF: [Career Pathways: Catalog of Toolkits](#)

WTW Activities and Career Pathways

One aspect of Career Pathways that many CWDs and Local Boards/AJCCs already successfully partner on is **subsidized employment**. Subsidized employment can be a key component of Career Pathways for WTW participants to enter and advance in a field of work. The CWDs that have successful subsidized employment partnerships with Local Boards and community colleges may serve as templates for other CWDs to develop and/or expand subsidized employment programs. Community college CalWORKs programs can utilize work study funds, job placement, and job development resources to aid in these efforts.

Other WTW activities that may be considered Career Pathway activities include vocational education training, job skills training directly related to employment, education directly related to employment, job search, job readiness, and job placement. Additionally, as stated in the [state WIOA plan](#), supportive services and barrier removal activities needed to support participation in education and employment may also be considered components of Career Pathways.

LOCAL BOARDS' RESPONSIBILITIES WITH PARTNERS

Memoranda of Understanding (MOUs) and Local Plans

Local Boards are responsible for working with partners to develop MOUs and local WIOA plans based on the state WIOA plan. Local MOUs and plans will be focused primarily on providing services to individuals using AJCCs as a primary resource for adults, dislocated workers, and youth who need to develop or improve skills—especially those with barriers to employment. Local Plans and MOUs are required to align, integrate, and coordinate services with AJCC partners.

The MOUs will specify which AJCC services are provided by which partners, which partners fund those services, and how services are coordinated to provide seamless entry, exit, and progress on participants' Career Pathways. For example, partners will need to specify in MOUs how they will coordinate assessment, the provision of supportive services (payment of child care, transportation services, and books and equipment costs), barrier-removal services, the payment of tuition and training costs, the provision of job readiness training, and job placement activities.

The Local Boards will also develop local WIOA plans based on the state WIOA plan, and the local plans will contain elements that are similar to those in the MOUs. The local plans need to describe how Local Boards and partners (including the CWDs) meet at least minimum levels of WIOA core program requirements, how program services are coordinated, and how services will be administered flexibly to meet the individual needs of clients. **Local Plans go into effect on July 1, 2018.**

More information about the requirements for MOUs between Local Boards/AJCCs and partners as well as Local Boards' local WIOA plans is available on the CWDB website at the [Local Boards webpage](#).

Local Boards' Regional and Sector Strategies

The CWDs provide services locally (within their own counties) and may be connected with partners that are established outside of the county but in the same economic region. In addition to operating at the state level (as a mandatory partner with CalWORKs) and the local level (providing participant services via the CWDs and AJCCs), WIOA operates through regional and sector strategies. Because the CWDs are not structured regionally, the CalWORKs-WIOA partnership is local, but there may still be opportunities to serve participants through regional and sector strategies.

Regional Strategies are achieved by Local Boards working together in regional planning units, which allow for the coordination and alignment of workforce development activities in the same economic region regardless of which county the Local Boards and their partners are in. Regional planning units work together to coordinate service delivery, share administrative costs, and plan how to best serve job seekers by working with economic development agencies in the same region.

Sector Strategies are designed to prioritize workforce efforts in careers that are likeliest to have job growth and incomes that lead to self-sufficiency. A key element of sector strategies is the emphasis on bringing together multiple employers from the same industry/field in partnerships within an employment sector to find solutions to their common workforce shortages. Under sector partnerships, employers work with representatives of labor, as well as education and workforce representatives, to develop a structured, focused approach to meet a specific sector's employment needs. For example, employment shortages in the information technology (IT) industry may bring together community colleges and multiple IT employers to work on a strategy to identify and train individuals to fill IT jobs in counties and economic regions.

For more information related to Regional and Sector Strategies, refer to chapter five of the [state WIOA plan](#), which includes a map and a list of Regional Planning Units.

PERFORMANCE MEASURES

Local Boards

The WIOA has **six primary** performance measures that Local Boards/AJCCs will need to report to the CWDB for reporting to the federal government:

1. Percentage of participants who are in unsubsidized employment during the second quarter after exit from the program;
2. percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program;
3. median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program;
4. percentage of participants who obtained a recognized post-secondary credential or a secondary school diploma, or its recognized equivalent during participation in or within one year after exit from the program;
5. percentage of participants during a program year in education or training program that leads to a recognized post-secondary credential or employment or who achieve measurable skill gains towards this goal; and
6. effectiveness in serving employers, based on indicators to be developed by DOL and ED from consultation with stakeholders and public comment.

The CWDB will negotiate statewide WIOA performance goals with the DOL and ED for the core programs. During the first year of WIOA performance accountability—which begins July 1, 2016—Title I programs (Adults, Dislocated Workers, and Youth needing employment assistance) will be assessed at the state, regional, and local levels. The other core programs (Adult Education, Wagner-Peyser Employment Services, and Vocational Rehabilitation) will be assessed at the state level only.

AJCC Mandatory Partner Assessment and Performance

- The state will initially assess AJCC mandatory partners, **including the CWDs**, on whether they are meeting baseline federal requirements pertaining to access to CalWORKs services in one or more local AJCCs.
- The CWDB has agreements from all core programs, as well as the CDSS and the California Welfare Directors Association (CWDA), to work collaboratively to ensure compliance on this performance assessment.
- The CWDB will develop an AJCC assessment policy that will assess the effectiveness of the AJCC system and the partnerships of the AJCC partner programs at the local and regional levels at least once every three years.

As explained in the state WIOA plan, recommendations on the criteria to be used in this assessment policy are being developed through the AJCC Design workgroup, which is convened and facilitated by both the CWDB and Employment Development Department. In addition to representatives from the Local Boards, CWDA, CDSS, CCCCCO and CWDs, this workgroup includes representatives from all core programs and other state and local partners in the AJCC system:

- California Department of Rehabilitation
- California Department of Education
- California Employment Training Panel
- California Workforce Association
- AJCC operators
- Local Community Colleges
- La Cooperativa (representing Migrant/Seasonal Farm Worker programs)

Guidance will be issued in the future regarding assessment of partners' WIOA performance.