



COUNTY OF LOS ANGELES WORKFORCE DEVELOPMENT, AGING AND COMMUNITY SERVICES



WORKFORCE DEVELOPMENT PROGRAMS DIRECTIVE

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COUNTY OF LOS ANGELES ALTERNATIVE STAFFING ORGANIZATION (ASO) PROGRAM POLICY AND PROCEDURES

EXECUTIVE SUMMARY

This directive provides information and guidance to agencies participating in the ASO program on County policy and procedures for this program. This directive is effective immediately.

REFERENCES

- Approved Strategies to Combat Homelessness Report published February 2016¹
- Workforce Innovation and Opportunity Act²
- United States Department of Housing and Urban Development (HUD) Homeless Definition³

BACKGROUND

The County of Los Angeles is currently experiencing a homelessness crisis with nearly 54,000 men, women and children homeless. In response to this crisis, the Board has approved 51 Homeless Initiative (HI) strategies to address homelessness. Two of these strategies focus on assisting the homeless into employment. Strategy C2, to increase employment opportunities for homeless adults by supporting Social Enterprises and Strategy C7, to provide homeless adults subsidized employment.

In support of strategies C2 and C7, the Alternative Staffing Organization (ASO) model shall provide homeless individuals as defined by the United States Department of Housing and Urban Development (HUD) with subsidized temporary employment paired with barrier removal services.

POLICY AND PROCEDURES

The Los Angeles County ASO program serves County residents who are 18 and over and who are considered homeless as defined by HUD by providing avenues into the workforce. This employment program aims to assist those affected by homelessness in the Los Angeles County region into subsidized temporary employment positions with the long-term goal of financial stability through stable employment in high-growth industries.

The ASOs will have dedicated staff to work with County partners, such as the Department of Social Services (DPSS), Los Angeles Homeless Services Authority (LAHSA), Community-Based Organizations (CBOs), the Los Angeles County America's Job Centers of California (AJCCs), and other entities providing services to homeless individuals, to provide participants co-case management, support, barrier removal services, and assistance with enrollment into Workforce Innovation and Opportunity Act (WIOA) or other appropriate workforce development program services, if eligible, and to ensure the programmatic success of LA County ASO. Furthermore, the ASOs shall ensure all individuals served under the LA County ASO program meet the eligibility requirements as set forth in the *Alternative Staffing Organization Program Services Statement of Work, Section 8.1* and shall provide services under the program as set forth in Sections 8.3 through 8.6.

Program Overview

The ASOs shall maintain an on-going relationship with DPSS, LAHSA, CBOs, AJCCs, and other organizations that serve homeless individuals to ensure the success of LA County ASO program and the ultimate success of homeless individuals seeking employment. ASOs will provide participants with an average of twenty-six (26) weeks of paid temporary employment at the current minimum wage of \$13.25 per hour, which shall increase commensurate with the County minimum wage policy. ASOs will also provide barrier removal services while the participant is in their temporary employment. Barrier removal services are provided to participants who face obstacles that prevent them from working, getting to work, and/or staying at work. Barriers include, but are not limited to, a suspended driver's license, lack of transportation funds, lack of housing, lack of childcare, lack of skills, lack of education, mental health and substance abuse issues. These services can include barrier removal support through direct assistance and/or referral to services.

Staffing Requirements

ASOs shall attend all mandated trainings conducted by WDACS or its authorized designee.

ASO staff shall abide by the following:

- Support the collaboration and partnership between DPSS, LAHSA, CBOs, AJCCs and other organizations that serve homeless individuals by designating staff to meet, in person, with partners and participants at a minimum of once a month at the partner's site.
- Ensure that information is effectively communicated to relevant ASO staff when a designee attends ASO program meetings and trainings on behalf of the ASO.
- Meet monthly via phone conference call or in person, to discuss program topics that include but are not limited to program results, progress and challenges.
- Attend workshops relevant to the ASO program.

- Assign a designated ASO contact for each location site prior to ASO beginning operation at that site by submitting the ASO Liaison and Alternate Contact Form (Attachment A) to HOME@wdacs.lacounty.gov. In case of change in assignment, Attachment A shall be resubmitted to WDACS within 5 business days of the change.

Co-Enrollment into Workforce Opportunity and Innovation Act (WIOA) or Other Workforce Development Programs

ASOs shall co-enroll, through collaboration with AJCCs, eligible program participants into WIOA or other Workforce Development programs if nine (9) months after initial placement in temporary employment, participant(s) have not gained permanent employment. ASOs are required to collaborate with an AJCC and enroll participant(s) into WIOA or other Workforce Development programs for additional employment services. However, at any time, ASOs can refer and co-enroll participants in WIOA or other funded Workforce Development programs if additional employment services are deemed to be beneficial. ASO participants must meet all WIOA and/or other Workforce Development program eligibility requirements, as applicable, at the time of enrollment.

Co-Case Management

The ASO shall collaborate and maintain a strong working relationship with DPSS, LAHSA, CBOs, AJCCs and other organizations that serve homeless individuals whom they are co-case managing with, to ensure that an integrated individualized employment plan is developed that results in placement in employment. ASO and partners are to use a collaborative process of assessment, planning, facilitation, care coordination, performance evaluation, and advocacy for options and services to meet an individual's comprehensive needs. ASOs will collaborate with partners to identify emerging employment barriers and address barriers through direct service provision and through partner services or referrals. ASO shall work with homeless service providers to understand participants continued supportive services needs that remain after the ASOs have provided barrier removal services while the participant was in their temporary job. ASOs shall notify WDACS of additional assistance needed in connecting participants to housing supports, substance abuse treatment, or other social service supports needed to assist participants successfully into employment.

Job Readiness Assessment

The Job Readiness Assessment (JRA) (Attachment B) is a tool used to evaluate work history, technical skills, existing barriers to employment, training needs, and need for other supports, such as uniforms, transportation, or other services. At the beginning of employment, ASOs shall share job readiness standards with new participants so it is clear what they should aim to achieve during their period of temporary employment and the factors which they will be assessed.

Each participant shall be assessed with the JRA regularly throughout the duration of

temporary employment participation. The supervisor shall evaluate a participant's job readiness based on real-time work experience. On the Evaluation Form, the supervisor shall complete: the four (4) categories of job readiness standards:

- Attendance & Punctuality
- Workplace Performance
- Workplace Appearance
- Communication & Attitude

Once participant(s) have been evaluated using the JRA, the ASO must update the Generic Application indicating the participant(s) score. Scores of three (3) or above will be considered a Pass. ASOs are required to evaluate a participant(s) using the JRA three (3) times at intervals for the duration of their temporary employment.

Worksite Acknowledgement Form

ASOs shall complete the Worksite Acknowledgement Form (Attachment C) with all participants prior to participant starting their temporary employment. The Worksite Acknowledgement Form confirms that the ASO, as the employer, has reviewed the responsibilities and participant's rights and that this has been acknowledged by both parties. The Worksite Acknowledgement Form shall be kept in participant(s) case file.

Employer of Record

ASOs serve as the Employer of Record. As such, participants in a temporary job activity shall be on-boarded following the established ASO's personnel policies, procedures and protocols. ASOs shall orient participants on important protocols including but not limited to: payroll practices, safety standards, scheduling, sexual harassment, reporting to work, and paid sick leave.

Healthy Workplaces, Healthy Families Act of 2014 and Paid Sick Leave

Healthy Workplaces, Healthy Families Act (HWHFA) of 2014 was signed by Governor Brown in September 2014. The HWHFA requires employers to provide paid sick leave to specified California employees beginning July 1, 2015. Under the legislation, an employee working in California on or after July 1, 2015, for the same employer for 30 or more days within a year, is entitled to pay sick leave. The paid sick leave accrues at the rate of one hour for every 30 hours worked and is payable at the employee's current rate of pay. Employees are entitled to begin using sick leave they have accrued on the 90th day of employment. ASOs shall develop and maintain internal protocols to gauge if/when a participant may be eligible for paid sick leave in accordance to HWHFA.

Enrollment and Referrals

ASO enrollments can occur through recruitment by the ASO, or by referral from DPSS, LAHSA, CBOs, AJCCs, or other organizations. Priority consideration for enrollment shall

be given to (a) General Relief Opportunities for Work (GROW) recipients, (b) referrals from Los Angeles Homeless Service Authority (LAHSA) homeless service providers, (c) AJCC homeless participants not served under Los Angeles: Regional Initiative for Social Enterprises (LA:RISE), and (d) former LA:RISE participants that have completed the Transitional Subsidized Employment (TSE) portion of LA:RISE but still need additional work experience

The ASO referral process can occur in two ways: (1) referrals from partners to ASOs which may be from DPSS, LAHSA, CBOs, AJCCs, or other organizations to ASOs via WDACS or (2) referrals from ASOs to partners for additional services.

1. Referrals from Partners to ASOs:

- a. DPSS, LAHSA, CBOs, AJCCs, or other organizations will screen applicants using the ASO Screening Tool (Attachment E), to ensure that they meet all ASO program eligibility requirements. If the applicant is deemed ineligible, they will not be referred but will be provided referrals to other programs or services for which they may be eligible. If the applicant is deemed eligible, the referring agency will proceed with the referral to the ASO. Referring agencies will provide WDACS a completed Partners to ASO Referral Form (Attachment I) and Consent and Release Agreement (Attachment D) signed by the participant to HOME@wdacs.lacounty.gov. It is crucial that it is explained to the applicant that they will be participating in the ASO program and that this is being done in order to help them gain temporary work experience that can lead to permanent employment.
- b. The ASO will confirm that the participant has been enrolled through enrollment in the Generic Module and enrollment in the CalJOBS Title I Application under the **954- Alternative Staffing Organization Program** Local Grant Code. If the ASO confirms that the participant was not enrolled, the partner agency will continue to provide services and referrals to other programs that they may be eligible for.

2. Referrals from ASOs to Partners for Additional Services:

- a. ASOs working with participants whom they've identified as needing additional supports and barrier removal services will refer participants to the appropriate subject matter experts in that field. ASOs will provide WDACS an ASO to Partner Referral Form (Attachment H) and Alternative Staffing Organization (ASO) Consent and Release Agreement (Attachment D) signed by the participant which will start tracking the stages of the referral until the process is completed and the participant is enrolled or received services from the partner agency. ASO to Partner Referral Form(s) and Consent and Release Agreement(s) shall be sent to WDACS at HOME@wdacs.lacounty.gov.

- b. WDACS will assign the participant to the partner agency based on the participant's choice indicated in the Referral Form.
- c. Partner agency staff must contact the participant for an appointment no later than two (2) business days after the assigned referral.
- d. After setting the date and time of appointment, partner agency staff must notify WDACS at HOME@wdacs.lacounty.gov of the details of the appointment.

Please note that it is possible that a participant may show up for services prior to the distribution of the email referral from WDACS, referred ASO participants shall not be turned away under any circumstances. This does not mean that the participant must be enrolled if not ready or willing to do so, but rather, they must be provided the opportunity to begin participating in the program.

Tracking and Reporting

Automated Referral System

The Automated Referral System (ARS) is a web-based application that is designed to automate referrals from partner County departments to AJCCs throughout Los Angeles County. It provides a simple online application to create a referral and a method to confirm that the referral has been received and note if the referred individual has been enrolled. Once the ARS is finalized and functioning, the ARS will replace the current paper-based system. The referrals shall be completed utilizing the ARS by ASOs, DPSS, LAHSA, CBOs, AJCCs, and other organizations. Details on how to use the system will be disseminated as they become available through an instructional manual and training. The current system of paper-based referrals will remain in place until the ARS system is fully-functional and the users are trained.

CalJOBS - Generic Module and Local Grant Code

Generic Module

ASOs shall enroll program participants in CalJOBS using the Generic Module application and all program progress must be tracked and continuously updated in the Generic Module. ASOs are to enroll participants using the Generic Module once eligibility has been determined. All rules and regulations regarding CalJOBS shall be adhered to when utilizing the system for the ASO program.

Local Grant Code

ASOs shall also enroll participants into CalJOBS Title I Application under the **954-Alternative Staffing Organization Program** Local Grant Code. Enrolling a participant in the ASO Local Grant Code allows for the tracking of participants in multiple programs. All activities that pertain to the ASO program must be tracked through the CalJOBS system.

All rules and regulations regarding CalJOBS shall be adhered to when utilizing the system for the ASO program. Instructions on how to use the generic module are provided in CalJOBS Help Sheet – How to Use the ASO Generic Module (Attachment F) and how to activate and use the local grant code are provided in the CalJOBS Help Sheet - How to use the ASO Local Grant Code (Attachment G).

ASOs shall utilize the CalJOBS system’s ASO Generic Module and ASO local grant code as designated by WDACS for the following:

- Update participant’s file with all data pertinent to program participation, in real time, including but not limited to: WIOA co-enrollment, support services, employment placement, etc.
- Input service provision activities utilizing CalJOBS Activity Codes

Performance Measures

Performance goals are included in each ASOs Performance Matrix. The Performance Measures are as follows:

- 75% Participants placed in temporary employment who retain either temporary or permanent employment for at least 26 weeks.
- 50% Participants that transition from temporary employment to permanent employment.
- 100% Of those continuing under this program after 9 months of initial placement, co-enroll in WIOA or County-approved workforce development program.

ACTION

L.A. County ASOs shall implement the procedures described in this directive and ensure that the information provided herein is communicated throughout the operations, management and governance structure of the ASO.

All ASOs shall ensure their assigned staff are provided all necessary training and supports to enable them to provide targeted and tailored services for the homeless population.

INQUIRIES

Inquiries regarding this directive and the policies and procedures described herein should be directed to HOME@wdacs.lacounty.gov.



**Irene Pelayo, Program Manager
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Attachments:

Attachment A- ASO Liaison and Alternate Contact Form

Attachment B- Job Readiness Assessment

Attachment C- Worksite Acknowledgement Form

Attachment D- ASO Consent and Release Form

Attachment E- ASO Screening Tool

Attachment F- CalJOBS Help Sheet - How to use the ASO Generic Module

Attachment G- CalJOBS Help Sheet - How to use the ASO Local Grant Code

Attachment H- ASO to Partners Referral Form

Attachment I- Partners to ASO Referral Form

¹ <http://homeless.lacounty.gov/wp-content/uploads/2017/01/HI-Report-Approved2.pdf>

² <https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf>

³ https://files.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf