Developing Policies and Procedures for REO Grants

A Reference Guide

WHY DEVELOP POLICIES AND PROCEDURES (P&PS)?

Reentry Employment Opportunities (REO) grantees are required to develop policies and procedures (P&Ps) to manage their REO grant(s) and to document adherence to their P&Ps.

Program policies provide specific guiding principles to connect a program's vision with its goals and offer a framework for staff to make programmatic decisions.

Program procedures operationalize policies with specific actions or steps necessary to implement proposed activities and provide staff with consistent instructions for handling program operations.

Establishing Program Policies & Procedures:

- Improves clarity among staff and partners
- Promotes consistency amongst staff and partners
- Reduces the chance of unintentional discrimination or bias
- Guides program decision-making
- Allows for verification of program activities across sites

For general grant operating guidance, make sure to review:
DOL's Core Monitoring Guide (2025) and the ETA Grantee Handbook (2020)

How This Reference Guide Can Help:

This guide introduces key resources you can use to inform central elements of your program P&Ps. Your Federal Project Officer (FPO) and Technical Assistance (TA) Coach are resources in the process, but it is up to your organization to develop the P&Ps that fit your program.

To develop a comprehensive and useful set of P&Ps, be prepared to:

1) **Funding Opportunity Announcement (FOA)** - Revisit the FOA that describes specific program requirements including participant eligibility, allowable services, mandatory partnerships, and program goals.
2) **Notice of Award (NOA) and Statement of Work (SOW)** - Review your approved NOA and SOW to understand your grant commitments and regulatory guidance.
3) Convene **leadership**, **program staff**, and **partners** to discuss options for effective and comprehensive program operations.
4) Seek input from your **FPO** and **TA Coach**!

***You* have the flexibility to develop policies and procedures that meet the unique needs of *your* community and programming.**

GENERAL OPERATING GUIDANCE FOR WIOA PROGRAMS

Reentry Employment Opportunity (REO) grants are a subset of Workforce Innovation and Opportunity Act (WIOA) programs and activities and are considered demonstration grants. REO grants are authorized under Section 169 of the WIOA of 2014. The WIOA resources referenced in this guide can inform your program, but not everything contained in the WIOA resources will apply to REO grantees.

Training & Employment Guidance Letters (TEGL) and **Training & Employment Notices (TEN)** define WIOA services and offer practical strategies for implementing them, along with case studies.

TEGLs and TENs are great resources!

Operating guidance for all WIOA Core Programs can be found in **TEGL No. 10-16.** While REO is not a core WIOA program, this TEGL provides details on the WIOA primary performance indicators that REO grantees must report.

Focus on your SOW and FOA.
When in doubt – reach out to your FPO and TA Coach!
Performance indicators specific to REO programs are described in **TEGL No. 14-18, Attachment 8**.

PARTICIPANT ELIGIBILITY AND INTAKE

Common Participant P&Ps:

- Consent to Participate
- Grievance
- EEOC Reporting
- Confidentiality/Data Sharing
- Photo Release
- Behavior/Re-offending
- Attendance
- Drug and Alcohol Usage
- Clothing and Attire
- Safety
- Program Dismissal

Participant eligibility is described in the FOA. Before enrolling any individuals in a REO program, you must ensure they meet the participant eligibility criteria stated in the FOA. Determining proper eligibility is critical as participants cannot be removed from REO programs after enrollment. **A list of recommended documents to confirm eligibility is provided by TEGL No. 23-19, Attachment 2: Source Documentation Guidelines**.

If your program has additional "suitability" criteria for program participation, then the criteria should also be defined in your enrollment policy along with a procedure for assessing the participant's suitability. Examples of suitability may include the willingness and ability to take a drug test, an interest in the training program(s) offered, or availability to participate during set hours.

Prior to enrolling an otherwise eligible male participant, grantees must **verify past Selective Service** enrollment or assist the individual in applying for Selective Service (see **TEGL No. 11-11, Change 2** on Selective Service requirements).

Note that REO grantees are directed to request participants' Social Security numbers (SSNs) at intake. However, **participants cannot be denied services** for choosing not to disclose their SSN.

A participant is considered enrolled in a REO program on the first date they receive a qualifying service (QS).

PARTICIPANT EDUCATION AND TRAINING SERVICES

Training and credentials vary greatly by industry, location, and providers. Grantees should **confirm with their FPO** that the participant trainings and credentials they offer are approved by the U.S. Department of Labor (DOL). **DOL does not** issue a comprehensive list of approved trainings or credentials. However, general safety and hygiene courses do not qualify as credentials, even if broadly required for entry-level employment. Examples of ineligible certificates include discrete skills such as general hygiene (handwashing), cardiopulmonary resuscitation (CPR), general safety, work readiness, and food-handling certificates.

For a **full list of the program services** that you must make available to participants, refer to your FOA, SOW, and approved program budget.

- TEGL No. 19-16 describes WIOA career, transitional **employment**, and training services.
- TEN No. 19-22 defines the types of trainings commonly offered by DOL programs.
- TEN No. 25-19 describes the key elements of postsecondary **credentials** and offers several attachments on additional education outcomes including diplomas, degrees, and certificates.
- Visit Workforce GPS Credential Attainment Resource Page for **additional** information.

PARTICIPANT SUPPORTS

REO programs may provide participant wages, stipends, and/or incentives as appropriate and approved in their SOW. Programs providing these supports are **required** to have a written policy on stipends, incentives, and needs-related payments that define the type(s) of payment they will use, how payments will be determined (eligibility criteria), and the method by which payments are processed and distributed.

A **variety of services** are described in TEN No. 12-21, Attachment 1: Practitioner's Guide to Supportive Services.

For additional information, refer to the REO Supportive Services Fact Sheet.

All forms of payment may have tax implications, so check the IRS website for additional information and check your FOA for limits on the amount of grant funds that can be used for any of these supports.

- **Stipends** are a form of wage replacement that enables participants to attend classes and training.
- **Wages** are compensation for services performed for an employer.
- **Incentives** are payments to participants in recognition of achievements tied to training activities and goals of the grant award.
- **Emergency assistance** for housing, mental health, and other needs are also allowable with a DOL-approved policy in place.
- **Supportive Services** are services that enable individuals to participate in WIOA activities. These include but are not limited to: referrals or direct assistance with transportation, childcare, housing, health care, mental health, drug counseling, educational testing, and work-related tools. Supportive services can be provided to participants at all points of programming including while in follow-up services.
- **Needs-Related Payments** are a type of supportive service that provides financial assistance directly to participants for the purpose of enabling them to participate in the REO program.

PARTICIPANT EXITS AND FOLLOW-UP

Participants are considered exited from a REO program when they have gone 90 days without a core service and when there are no plans to provide an additional core service. Supportive services and follow-up services are not core services and do not prevent exit. TEGL No. 14-18, Attachment 8 defines a Participant Exit and describes how the date of exit is determined.

Participants are *automatically exited* in the Grant Performance Management System (GPMS) when they have gone 90 days without a qualifying service (QS). The participant "Date of Exit" will reflect the "Last Service Date" a qualified service was provided.

Once a participant is exited from a REO program, no additional services, other than supportive services or follow-up services, should be recorded for them.

- **Follow-up services** may begin immediately upon a participant's program exit and are addressed in TEGL No. 19-16.
- REO grantees must provide a minimum of **12 months of follow-up services** and are required to collect several data points during this time. These are described in TEGL No. 10-16, and TEGL No. 14-18, Attachment 8.
- TEGL No. 10-16, Attachment 3 provides a **Wage Conversion Chart** with instructions for converting participant wages into quarterly earnings post-exit and recording them in follow-up.

PARTICIPANT RECORD KEEPING

REO grantees are likely to be in possession of sensitive personally identifiable information (PII) that, alone or combined with other information, can be linked to specific individuals in your program and compromise their privacy. While this information may be necessary to provide and document program services, great care should be taken in preserving this information properly.

If it's not documented, then it didn't happen!

TEGL No. 23-19, Attachment 2 provides examples of acceptable documentation programs can collect. **REO grantees should have a policy for periodic monitoring of source documentation.**

- TEGL No. 23-19: Validating Required Performance Data Submitted by Grant Recipients describes the types of internal controls and quality assurance techniques that grantees can use to verify the accuracy and reliability of data reported to DOL, such as confirming participant eligibility. DOL recommends grant recipients administer quarterly reviews of their performance outcomes to compare against expected outcomes, to ensure data entry is timely, and to ensure reported outcomes are accurately reflected with supporting documentation.
- TEGL No. 39-11: Handling and Protection of Personally Identifiable Information (PII) defines the types of PII programs may collect from grantees and offers suggestions for safeguarding this info.

This guide provides an overview of WIOA and REO resources and ideas for establishing your program policies and procedures at the start of your grant.

Your FPO and TA Coach are always here to help and answer your questions!