



## **Accelerated Skills Training**

ACCELERATED SKILLS TRAINING PROGRAM (AST)  
WORKFORCE RECOVERY TRAINING (WRTP)  
POLICIES AND PROCEDURES MANUAL

## KEY TERMS

**Accelerated Skills Training (AST) Instructional Team** - Instructor who teach in the approved AST programs

**Accelerated Skills Training (AST) Programs** – Training programs funded by the WRTP grant which include: Masonry, Welding, Core Construction, Carpentry, Electrical Power Lineman Program, Heavy Equipment Operator, and Apartment Maintenance Technician.

**Accelerated Skills Training (AST) Team** - All Valencia College staff that support AST programs.

**Applicant** - A potential student who is currently going through the application and verification process.

**Business Operation Manager and Director** – This team works to ensure all of the tracking for enrollments and grant funding meet the compliance guidelines for the WRTP grant and the College. The Business Operations team partners with the Grants Management team on invoicing and reports.

**Continuing Education Team** - All Valencia College staff who work in the Professional and Continuing Education Department. The AST Team and Program Staff are included in this department.

**Director of Recruitment** - Supervises the Program Staff. This person will also work closely with the Senior Director of Recruitment and Program Director on the grant deliverables.

**Florida Department of Economic Opportunity (FLDEO)** - The funding agency for the WRTP grant.

**Grants Management Team**-Consists of grant compliance and accounting staff that provide administrative support and oversight of performance and financial monitoring of the grant. The grant compliance staff is the Director of Grant Compliance and accounting staff is a Grant Accounting Specialist.

**Program Director**- The administrator over the grant who provides program oversight. This individual serves as the program contact for FLDEO.

**Program Staff** - The Recruiter/Case Manager and Implementation Coordinator. These positions are funded by the WRTP grant.

**Senior Director of Recruitment** – Will assist the Program Director with the grant monitoring and reporting. This person also provides leadership oversight to the recruitment and job placement team.

**Student** - A person who has been accepted by the Program Staff and is enrolled in one of the approved programs.

**Workforce Recovery Training Program (WRTP)** - This grant program is to support disaster recovery by providing training in construction trades to low- and moderate-income (“LMI”) individuals in the Hurricane Irma most impacted and distressed (“MID”) areas, leading to successful employment following program completion.

## **OVERVIEW**

### **Purpose of the Grant**

On September 10, 2017, Hurricane Irma made landfall on Cudjoe Key in Monroe County as a Category 4 storm. Irma then turned northward, making a second landfall near Marco Island and progressed northward through the center of the state. In the wake of this natural disaster, Florida officials and citizens came together to recover and rebuild, but significant unmet needs remain. Hurricane Irma had a significant impact on the housing supply, creating an increased demand for new construction and home repair activities, with additional impacts on commercial construction and repair activities. The increased demand for construction activities following Hurricane Irma has created or increased the supply gap in many construction occupations. Unmet needs assessments for employment show a long-term supply gap for skilled workers in several construction trades, including construction laborers, carpenters, electricians, painters, plumbers, and roofers. By addressing the unmet needs in the construction trades, Florida can provide a new labor force to support the increased demands for post-disaster construction, as well as support Floridians looking for new employment in the post-disaster economy.

### **Our Program**

Central Florida, like many other counties is experiencing a severe shortage of skilled talent for many of the trades. Prior to Hurricane Irma in 2017, the construction industry was experiencing rapid growth with multiple large-scale projects in our community. From 2017 to the present, the construction industry’s workforce continues to shrink due to the transitioning of older employees retiring, and younger generations not aware of the great career opportunities that exist in this field.

To address the workforce skills gaps in Central Florida, Valencia College's Accelerated Skills Training (AST) Programs were specifically designed to target local unemployed and underemployed potential students, train them in high demand skills with embedded national industry-recognized certifications, and help place them with employers who have a significant skills gap. AST programs provide non-degree workforce development programs at a flat-rate fee.

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This grant program will fund training and support services for student enrolled in:

- Welding 1 & 2 (20 weeks per program)
- Core Construction (6-week program)
- Masonry (6-week program)
- Carpentry (10-week program)
- Heavy Equipment Operator (10-week program)
- Apartment Maintenance Technician (10-week program)
- Electrical Power Lineman Program (15-week program).

We expect to serve 700 students of which at least 51% will qualify as low-or moderate income (LMI).

With regard to the support services that will be provided, Valencia's impressive AST program results are due to a case management model, a high-touch approach that begins with a recruitment interview (including a skills and interest inventory), and continues through program completion and beyond. Progress is monitored regularly with attendance or performance issues addressed immediately to keep learners on track. Participants complete practice interview sessions and visit job sites to meet industry workers and leaders, with coaching provided throughout to ensure student success. In addition to these supportive services, Valencia will provide assistance to all potential applicants and students in their native language.

### **This Manual**

This manual (Accelerated Skills Training Workforce Recovery Training Policies and Procedure Manual, AST-WRTP Manual) will help to communication and guide all actions of the program. This manual will be made available to staff, applicants, students, and the general public on the Valencia College website. As changes are made to the manual, the newest version of this manual will be posted on the website to avoid misinformation or confusion with potential students.

Internally, our grants management team will keep a record of all policy and procedure changes as well as a copy of all versions of this manual. For program staff, communication regarding all changes will occur via email and also a verbal update in weekly grant meetings.

If compliance or eligibility changes are made that directly impact applicants or students, all parties will be contacted via email or phone. The program staff will review the changes with the applicant or student to ensure that the information was received and understood.

### **Program Staff**

**Program Director** - The Program Director is the administrator of this grant. This role ensures that all requirements of the grant are being properly executed and program outcomes and deliverables are achieved. This role works closely with the Director of Grant Compliance and the FLDEO team.

**Recruiter/Case Manager** - The Recruiter is responsible for the process from student outreach to job placement. This role will recruit qualified students, assist students with the application and enrollment process, provide case management services throughout the program, provide career coaching services, assist with removing barriers, and help secure a job after program completion. Additionally, this role will track and report all grant results and work closely with the Program Director and Director of Grant Compliance.

**Implementation Coordinator** - The Implementation Coordinator is responsible for supporting the Recruiter with the duties listed above.

### **Procurement Policies and Procedures**

Valencia College has formal Procurement policies compliant with applicable Florida laws and regulations for acquisition of goods and services. The policies are located on the College website at: <https://valenciacollege.edu/about/general-counsel/policy/>

- 6Hx28:3E-03-Ethical Conduct and Performance
- 6Hx28:5-07-Contracts
- 6Hx28:5-10.1-No Preferences in Procurement
- 6Hx28:5-10-Procurement Requirements for Commodities and Services
- 6Hx28:5-13-Signatures

In addition, internal Procurement procedures and guideline are located on the College's Procurement website at: <https://valenciacollege.edu/employees/procurement/procurement-procedures.php>

- 1.0-Procurement Requirements of Goods and Services
- 2.0-Procedure for Protest of Competitive Solicitations Decisions/Intended Decisions
- 3.0-Procurement Procedure for Federal Grants

For this WRTP program, the College reviewed the educational materials, supplies, translation services, and printing items in support of our workforce training, support and career services. It has determined that there will be no purchases exceeding \$4,999 under this grant.

All personally identifiable information , bids that include proprietary and copyrighted materials, and any financial statements submitted by bidders will be kept secure and private and in compliance with policies of the College.

## Contract Administration Policies and Procedures

Valencia College has formal contract administration procedures that have been adopted to implement College Policy 6Hx28:5-07, and promote compliance with related Florida laws. Valencia College will follow its internal procedures for contract administration in compliance with regulations 2 CFR 200.317-200.326. The Office of Contracts and Records provides oversight of the contract administration and procedures include these best practices:

- Utilizing contract templates for developing contract.
- Identifying a contract administrator for each contract executed.
- Implementing a process to ensure contractor abides by the terms of the contract procedures.
- Implementing a deliverable review/approval process.
- Implementing a process for managing issues that may arise with the contractor.

The Office of Contracts and Records works in collaboration with the Grants Management Team for compliance and monitoring of contractors when services are purchased with grant funds.

Additional contract administration information is found at the following link:

<https://valenciacollege.edu/employees/procurement/contracts.php>. Contracts that are awarded with federal funds must also adhere to Special Provisions, Appendix II Contract Provisions for Non-Federal Entity Contracts Under Federal Awards, found at the following link: [https://valenciacollege.edu/employees/procurement/documents/special\\_contract\\_provisions\\_grants.pdf](https://valenciacollege.edu/employees/procurement/documents/special_contract_provisions_grants.pdf).

For this W RTP program, should there be a change in scope resulting in the need for different procurement methods or contracted services, as applicable:

- To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft design plans and specifications, requirements, statements of work, and invitations for bids or requests for proposals will be excluded from competing for such procurements as required in 2 CFR Section 200.319 (a).
- The College will make awards only to responsible Contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. [2 CFR § 200.318(h)]. The College's Procurement Department and Resource Development Office will assess vendor responsibility. Contractors and vendors must affirmatively demonstrate their responsibility and the responsibility of their proposed subcontractors.
- The College requires that its contractors equal employment opportunity to all employees and applicants for employment without regard to race, color,

religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment and in compliance with the College's policies.

For this WRTP program, as applicable, Valencia College construction or housing rehabilitation contracts or subcontracts exceeding the Simplified Acquisition Threshold of \$250,000 may accept the [the College's contractor bonding policy and requirements provided that the federal awarding agency or pass-through entity has determined that the federal interest is adequately protected. If such a determination has not been made, the minimum requirements must be as follows:

- A bid guarantee from each bidder equivalent to five percent of the bid price. The bid guarantee must consist of a firm commitment, such as a bid bond, certified check, or other negotiable instrument, accompanying a bid as assurance that the bidder will, upon acceptance of its bid, execute such contractual documents as required within the time specified. [2 CFR § 200.325 (a)]
- A performance bond on the part of the Contractor for 100 percent of the contract price. A performance bond is one executed in connection with a Contract to secure fulfillment of all the contractor's obligations under such contract. [2 CFR § 200.325 (b)]
- A payment bond on the part of the Contractor for 100 percent of the contract price. A payment bond is one executed in connection with a contract to assure payment, as required by law, of all persons supplying labor and material in the execution of the work provided for in the contract. [2 CFR § 200.325 (c)]

### Section 3

Specifically for this WRTP program, as applicable, the College will ensure that employment and other economic and business opportunities generated by HUD financial assistance, to the greatest extent feasible, are directed to public housing residents and other low-income persons, particularly recipients of government housing assistance, and business concerns that provide economic opportunities to low- and very- low income persons.

These requirements are triggered whenever the need for new employment, contracting or subcontracting is established for federally funded projects involving the construction or rehabilitation of housing, or other public construction projects, valued at \$200,000 or more and contracts of \$100,000 or more. The College will apply these regulations to construction and

professional services contracts alike and cover the entire project regardless of whether it is fully or partially funded by HUD. Contracts or subcontract funded under this program are subject to the contractual provision in Attachment C of this Manual.

### **Financial Management Policies and Procedures**

Valencia College Grants Administrative Procedures 4.1, 4.12, 4.2 and 4.6 describes the procedures that have adopted to implement College Policies 6Hx28:6-01.1 and 6Hx28:7B-03, and to promote compliance with related Florida laws and regulations for financial management. Valencia College will follow its internal procedures for financial management, which is in compliance with 2 CRF 200.302-200.303, 200.501-200.507, and 24 CFR 570.502. The procedures are included as Attachment B.

As part of our grants administration process, financial management is administered by the Office of Business Operations and Financial Services and directly managed by the Grants Accounting Office. The Grants Accounting Office serves on the grants management team and provides oversight of all grant-related expenditures to ensure compliance. A Grants Accounting Specialist is assigned to every grant, as well be for this WRTP grant. Oversight includes, but is not limited to:

- Review, approve and record financial transactions
- Routine comparison of financial records to actual assets and liabilities
- Maintain accounting record entries with documentation such as receipts, invoices, and requisitions
- Determine reasonableness, allowability, and allocability of costs
- Financial reporting of WRTP grant activities, including:
  - Amount budgeted
  - Advances/reimbursements received to date
  - Program income & other miscellaneous receipts
  - Actual expenditure/disbursements
  - Current encumbrances/obligations
  - Unpaid request for payments

The will comply with audit requirements, as specified in the DEO Subrecipient Agreement I0109, which states that a Single program-specific audit must be conducted if \$750,000 or more in federal awards are expended within a fiscal year. The Office of Financial Services is responsible for completing the Single Audit Report. The most recent Single Audit Report is available for the fiscal year ending June 2020, and can be obtained by contacting the Valencia College Office of Financial Services or on the Florida Auditor General Website at [https://flauditor.gov/pages/pdf\\_files/2021-183.pdf](https://flauditor.gov/pages/pdf_files/2021-183.pdf)

### **Monitoring Policies and Procedures**



Valencia College Resource Development Office procedure 3.0 the procedures that have adopted to implement College Policies 6Hx28:9-06, promote compliance with related Florida laws and regulations for monitoring program performance. Valencia College will follow its internal procedures monitoring, which is in compliance with 2 CRF 200.329. The procedure is included as Attachment C.

As part of our grants administration process, program performance is monitored under the division of Office of Analytics and Planning and directly managed by the Resource Development Office. The Resource Development Office serves on the grants management team and provides oversight of all post-award programmatic activities. Each grant is assigned a staff, and the Director of Grant Compliance will provide management of this grant. Oversight includes, but is not limited to:

- Risk assessments
- Performance monitoring through at least quarterly meetings/reviews with project team
- Documentation and tracking of compliance system
- Compliance with contract/agreement requirements
- Implementation program timelines and milestones

### **Recordkeeping Policies and Procedures**

The Continuing Education AST team will create an electronic student record for each student. This record will be kept in our Customer Relationship Management (CRM) system (Target X). This secured system tracks all communication and activities with a student. As program activities are completed and milestones achieved, the student record will be updated by the Recruiter/Case Manager or the Implementation Coordinator.

The following documents, at minimum, will be included in the student record:

- Completed application
- Copy of the applicant's photo identification
- Proof of address
- Proof of work authorization
- Documentation of other forms of assistance
- Proof of income for household members
- Consent and release of personal information form
- Fraud acknowledgement regarding false or misleading statements certification.

The file will include the disability verification or veteran status forms, as applicable. The file will also include the eligibility determination and a copy of the approval or rejection letter sent to the applicant and any subsequent appeal process. If the applicant is accepted, the file will include documents related to his or her progress in the program, including class attendance, class performance progress, and job placement information.

The applicant file will be consistently updated throughout the lifecycle of the process. Because all documents will be managed through the CRM system there will be a detailed record of documents obtained and information that is pending. At the beginning of the program, mid-point of the program, and end of program, our grant team will audit the student files to ensure that all documentation is in order and accounted for. Examples of some critical milestones are: application process, acceptance into the program and grant, start of program, certifications earned, program performance checks, resume/interview sessions, job search activity, and final job placement.

The primary team members that will have access to student information will be our Program Staff, Senior Director of Recruitment, Director of Recruitment, and our Business Operation Manager and Director. The Grants Management Team will also have access to student records and information for purposes of invoicing and internal monitoring of the program. All access to these records is tracked through the CRM system. If there is a need for access for external monitoring or audit, our team can accommodate this review as required. Valencia College proactively protects all student information and protection of student information is monitored by our Office for Information Technology to ensure that security of this information is a top priority. All personally identifiable information of students will kept secure and private. Personally identifiable information will be password protected when transmitted electronically.

Valencia will retain compliance records for five years from the date of an issued audit report or from six state fiscal years after all reporting requirements are satisfied and final payments received, whichever is longer. Valencia will make audit working papers available upon request for a period of six years from the date any audit report is issued, unless this deadline is extended in writing by DEO. Valencia will use the information in the files to report on grant and program progress for our required reports, including the monthly and quarterly reports.

Additional guidance regarding record management in compliance with Florida law and regulations 24 CFR 570.506, 24 CFR 570.490 and 2 CFR 300.333-337 a detailed in Volume 7a, Information Technology and Volume 7b, Records Management can be found at the following link: <https://valenciacollege.edu/about/general-counsel/policy/>

### **Application Intake Policies and Procedures**

The overall steps in the outreach and application process are:

1. Outreach to recruit potential applicants
2. Application intake process (two pathways identified)
3. Review of application information and supporting paperwork
  - i. Duplication of benefits procedures
  - ii. Income verification procedures
4. Review of available funding for applicant

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5. Review of support services needed for success
6. Communication about the start of the program

### **1. Outreach**

Valencia College has a robust grass roots marketing model which targets unemployed, underemployed, veterans and women into careers in construction. The majority of these individuals are within the defined LMI category. The strategy for engaging with these audiences is to partner with other agencies who serve and interact with these diverse populations. One example is the current partnership with The City of Orlando BLUEPRINT 2.0 project. This project provides a living stipend for each week students are performing in class.

In addition to working with community partners, the AST Team also attends multiple types of community events including job fairs, farmer's markets, events sponsored by Commissioners, and high school career fairs. The use of printed materials helps our partners in explaining the educational opportunities available at the college. The Continuing Education Team also has a full time Social Media Manager who is responsible for generating content to four social media channels.

### **2. The Application Intake Process**

Pathway #1:

Applicants for this grant program may enter the application intake process through two sources: (1) WRTP DEO application or (2) the Valencia College AST Application.

For students who complete the DEO application, DEO will provide Valencia with all of the application information in order for our team to review and determine eligibility. The application is located at: <https://floridajobs.org/rebuildflorida/irma/workforce-recovery-training>. The required paperwork through the DEO portal is as follows:

- General applicant information, including contact information, language preferences, and date of birth.
- Indication of interest in receiving training from Valencia College's Accelerated Skills Training Program
- Household information, including the name and income of household members
- Duplication of benefits information
- Photo identification (list of acceptable documents in Appendix A)
- Proof of current address (list of acceptable documents in Appendix A)
- Proof of Work Authorization (list of acceptable documents in Appendix A)
- Documentation of other forms of assistance (list of acceptable documents in Appendix A)

- Proof of income for all adult household members (list of acceptable documents in Appendix A)
- Consent and release of Personal Information Form (Appendix B)
- Fraud acknowledgement regarding or misleading statements certification (Appendix C)
- If applicable: verification of Disability Form (list of acceptable documents in Appendix A)
- If applicable: Proof of status as a veteran or active duty spouse of dependent (list of acceptable documents in Appendix A)

Daily, the Grant Recruiter/Implementation Coordinator will check in the DEO portal for any new applications and contact any new applicants to help them with the application process. The Grant Recruiter/Implementation Coordinator will input basic information for each applicant into our Customer Relationship Management System (Target X), which allows staff to track all activity with the applicant.

#### Pathway #2:

Applicants may also enter the application process through the AST Inquiry/Application Form. This is a short, free application form that connects the applicant with our Grant Recruiter/Implementation Coordinator. This form collects initial information about the student and possible program(s) of interest. Upon completion of the application form, the student will automatically receive an email with basic information about the program, career field, and the industry.

Within two business days of completing the AST Inquiry/Application Form, the Grant Recruiter/Implementation Coordinator will contact to the applicant to begin the application intake process and complete the DEO application either in person, phone, or remote appointment. Our team will make onsite application services for students who do not have a computer or need assistance with navigating the websites.

Our approved programs have multiple start dates throughout the year, during the spring, summer and fall semesters, at the approved locations. We recruit students 12 months out of the year, therefore Valencia will accept applications throughout the life cycle of the grant.

### **3. Review of Application Information**

#### *Duplication of Benefits Policies and Procedures*

Valencia will use the DEO application for collecting information for duplication of benefits. The Recruiter/Implementation Coordinator will review the information in this section of the application and follow up with each applicant as applicable.

- The goal is to prevent duplication of benefits for participants enrolled in our W RTP program.

- The Recruiter/Implementation Coordinator will ensure that each student completes Section 3 of the DEO application to determine if duplication of benefits is applicable. The student will submit the appropriate documentation as directed.
- If there is a determination that the student has received prior benefits by disclosing this information in Section 3 of the DEO application, the Recruiter/Implementation Coordinator will inform the student via email, text and/or phone call within two business days of their ineligibility for the program.
- For any incomplete applications, the Recruiter/Implementation Coordinator will follow up with the student via email, text and/or phone call within two business days. The goal is to gather the missing information and keep the student progressing through the application process. For students who may need assistance, the Recruiter/Implementation Coordinator will provide hands on assistance to help any student with the application process.
- The Recruiter/Implementation Coordinator will maintain application decision on a log.

While Valencia anticipates that very few students have received prior benefits, Valencia will carefully review duplication of benefits (DOB) questions in the application for each participant to determine if a DOB situation is likely.

For students who indicate prior benefits received, Valencia will verify the DOB information and collect any additional documents for proof of benefits. Valencia will document all verification and outreach steps in the applicant file. Valencia will conduct two additional DOB checks with students (mid-point and two weeks before the program ends) to ensure that additional benefits have not been received. These checks will be documented in the student's file. At both of these checks, students will be required to affirm that they have not received duplicative assistance during the duration of the program.

Upon program exit, students will be reminded that they must disclose their participation in this program to future providers of this program. To address any potential future duplication of benefits, applicants must enter into a Subrogation Agreement attesting to repay any assistance later received for the same purpose as the CDBG-DR funds. Valencia will require this Subrogation Agreement be signed no later than the first day of class. The Agreement will be maintained in the student file.

If Valencia discovers that there have been benefits awarded to the participant, after the training has been completed, the College will act to recapture the amount of the duplication. Valencia will work with our legal and business offices to assess whether the monetary value of the duplicative assistance reaches their threshold for pursuing legal action against a student.

### ***Income Documentation Verification, and Self-Certification Policies and Procedures***

Valencia College will comply with the requirement that eligibility determination is an inherently governmental function that must be carried out by a governmental entity. Through the DEO application portal, applicants will be required to submit documentation to verify their household income. A W2, tax return, or other official documentation described in Appendix A will be used to verify household income.

When additional documents or verification are needed, a meeting with the applicant will be scheduled to discuss the information needed. Once documents are obtained our Recruiter/Implementation Coordinator will contact the source to verify the information. When sufficient information is not available after multiple attempts have been made, applicants may be provided with WRTP-Self Attestation Form or the Zero Income Self-Attestation Form.

If an applicant is unable to provide the required documents, they may supply a self-certification verifying household income. This self-certification will be the documentation of last resort, and is subject to verification by our Recruiter/Implementation Coordinator.

The reported income for all applicants will be checked against HUD's latest income thresholds for low income status. The current LMI limits for our area counties can be found at [http://floridajobs.org/docs/default-source/communicationsfiles/rebuild-florida-document/2019-income-limits.pdf?sfvrsn=dd137fb0\\_6](http://floridajobs.org/docs/default-source/communicationsfiles/rebuild-florida-document/2019-income-limits.pdf?sfvrsn=dd137fb0_6)

The WRTP Self-Attestation Form or Zero Income Self-Attestation Form must be verified by at least one of the following methods:

- W-2's or 1099 associated with social security number
- Verification of non-filing letter from the IRS
- Request for Transcript of Tax return (Form 4506-T)
- Documents from state of federal benefit agency that show zero income, such as eligibility notices for food stamps or Medicaid
- Termination letter from employer
- Notice of severance pay on last paycheck stub, and/or
- If job loss due to company closure, a notification letter provided by previous employers

Applicants who do not qualify as low or moderate income can still enroll in the program. However, Valencia will reassess its progress towards the 51% LMI target after each course enrollment and may prioritize candidates who qualify as LMI over those who do not.

#### ***4. Funding Review of Applicants***

The Program Staff will make every effort to ensure that FLDEO WRTP is the funding of last resort.

After each applicant has successfully completed the application process, the Recruiter/Implementation Coordinator will conduct a thorough assessment of any funding (WIOA, federal, state, or local) currently available. If available funding exists, the Recruiter/Implementation Coordinator will assist/provide information on how to apply for that source of funding.

If there are no funds available, the Recruiter/Implementation Coordinator will use WRTP funding to cover the tuition costs of the program.

There may also be cases where only a partial funding source exists. The Recruiter/Implementation Coordinator will work with the student on the available funds and then provide the additional funds needed for the program tuition.

### ***5. Review of Support Services***

During the application intake process, the Recruiter/Implementation Coordinator will also assess factors that may influence the job placement. The Recruiter/Implementation Coordinator will also discuss any barriers (transportation, child care issues) to program success. If a student has a barrier, the Recruiter/Implementation Coordinator will work with a community partner to identify resources. All barriers will be logged and tracked in the student record.

### ***6. Communication at Start of the Program***

The Recruiter/Implementation Coordinator will notify each student via email on acceptance or denial into the program. For students that have been accepted into the program, the student will be enrolled into our registration system and their information is tracked in our system. Our Business Office will then process the enrollment request and bill the grant for the appropriate tuition. Once a student is enrolled into the program, they will receive first day class information from the Recruiter/Implementation Coordinator via email.

All efforts will be made to communicate with students in a manner that is clear and easy to understand, and in a language where the student is most comfortable, particularly English, Spanish and Haitian Creole. Documents will be provided in these languages as applicable. FLDEO documents may be provided in English, Spanish and Haitian Creole for understanding, however the submitted document will be in English.

### **Eligibility Determination Policies and Procedures**

Applicants interested in enrolling in the program will be directed to complete an application and undergo an eligibility determination process. Program Staff will monitor income certifications to ensure at least 51% of total class seats issued go to LMI persons in order to meet the national objective.

Applicants that are a Veteran, spouse or dependent of a Veteran, and applicants with LMI incomes will be given priority for admission into the program. While applicants who do not qualify as low to moderate income can still enroll in the program, Valencia will review our LMI goals after the start of each program to ensure that we are tracking to meet our 51% objective.

All applications will be reviewed with the following criteria as required by FLDEO:

- Income: Annual Income as reported under the Census long-form for the most recent available decennial. The Census definition includes:
  - Wages, salaries, tips, commissions, etc.,
  - Self-employment income from own nonfarm business, including proprietorships and partnerships
  - Farm self-employment income
  - Interest, dividends, net rental income, or income from estates or trusts
  - Social Security or railroad retirement
  - Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs
  - Retirement, survivor, or disability pensions
  - Any other sources of income received regularly, including Veterans' (VA) payments unemployment compensation and alimony
- Income: Participants are not required to be LMI, however, all income data will be checked against HUD's latest income limits and reported accordingly. Valencia will not allow more than 49% enrollment of non-LMI students by maintaining threshold for maximum number of non-LMI students per semester.
- Work Eligibility: All participant must be eligible to work in the United States.
- Identity: All participants must have provided documentation establishing proof of identity.
- Age: All participants must be at least 18 years of age or older.

### **Language Access Policies and Procedures**

Valencia College recognizes the many challenges for individuals for whom English is not their native language. Also, industry partners have been very clear that basic English language skills are essential to a productive and safe work environment. Therefore, Valencia's goal is to provide language skills for participants, rather than provide full programs in multiple languages. This is further evidence of a case management approach that considers and values the whole person.

Students that progress to a Level 5 and/or test into a Level 5 will receive additional support with language interpretation by Valencia instructors and the Recruiter/Implementation



Coordinator. Multiple members of the Valencia AST instructional team and Grant Implementation Coordinator are bi-lingual (English and Spanish). For the Haitian Creole population, a counselor from ESOL program will engage to assist with supporting classroom learning and the job placement process.

The pairing of language and workforce skills will further increase the employment success rate and economic viability for program participants in both the short and long term. Increased language abilities elevate not only employment outcomes but general quality of life through greater community and family interaction. Through customized language courses, Valencia seeks to provide a method for individuals to achieve these goals. If an applicant inquiry about the programs and is not proficient enough to complete the initial paperwork, our Recruiter/Implementation Coordinator has access to multi language speakers who can assist the applicant with the application process.

### **Reporting Methodology Policies and Procedures**

Valencia College will submit all reports and information as required by the Subrecipient Agreement. The monthly reports and administrative closeout reports will include the current status and progress of the program in alignment with the Scope of Work and the expenditure of funds. Reports include:

- **Monthly Progress Report**- submitted within 10 calendar days after the end of each month.
- **Quarterly Progress Report**- submitted no later than the 10<sup>th</sup> of every April, July, October and January.
- **Contract and Subcontract Activity Form HUD-2516**-submitted by April 15<sup>th</sup> and October 15<sup>th</sup> each year through the DEO's SERA reporting system. The form will reflect all contractual activity for the period, including Minority Business Enterprise and Woman Business Enterprise. The report is located at: , currently available at [https://www.hud.gov/sites/documents/DOC\\_36660](https://www.hud.gov/sites/documents/DOC_36660)

The Project Director will complete all program reports in the required formats and with all required information based on program data. The Grants Accounting Office (Grants Accounting Specialist) will complete all financial reports in the required formats. In alignment with the Valencia College monitoring and reporting procedures, the Resource Development Office (Director of Grant Compliance) will review all reports prior to submission. The Resource Development Office will submit all program reports and may submit financial reports as applicable, otherwise the Grants Accounting Office will submit financial reports.

### **Complaints and Grievances Policies and Procedures**

The Recruiter/Implementation Coordinator will work in close collaboration with the Valencia College Title IX Coordinator to ensure compliance with complaints and grievances (including

logging, tracking and resolution) in accordance with the WRTP Subrecipient Equal Opportunity Plan 2021 and Valencia College policy at: <https://valenciacollege.edu/about/general-counsel/policy/documents/volume2/2-01-discrimination-harassment-related-conduct.pdf>.

### **Appeals Policies and Procedures**

All WRTP applicants will receive notice of their enrollment status via an acceptance or rejection email and text. If needed applicants may be informed via the mail if other communication channels are not available. Every attempt will be made to work applicants before rejecting them from this program. Appeals may only be filed upon the basis of an adverse decision regarding eligibility, benefits, or closure of an application.

If an applicant is rejected, the reasons for this action will be clearly outlined in the communication. All appeals may be filed via email, mail or in person.

To file an appeal, applicants would contact:

Crystina Rubio  
Grant Recruiter  
8600 Valencia College Lane  
Orlando FL 32825  
407-582-8207  
[Crubio12@valenciacollege.edu](mailto:Crubio12@valenciacollege.edu)

In the case of a rejection, the applicant will have 15 calendar days from the date on the communication to alert the Program team that an appeal will be requested in writing. If the Program Staff does not receive a written request for an appeal, the file will be closed and a copy will be retained for potential monitoring.

If the applicant requests an appeal, the applicant will have an additional 30 calendar days from the date of the request to supply the Program Staff with the information that contest the reason stated in the email or text. Applicants who neglect to provide the required information to contest the appeal or provide further insufficient evidence will be notified of the rejected appeal in an email and a letter and the file will be closed.

The Program Staff will review the additional information collected as part of the appeal within 15 calendar days of receipt and issue a final determination. The Program Staff may amend this timeframe if the applicant provides specific reasoning for an extension.

The Program Staff will evaluate the new information provided and determine if the new information provided addresses the reasons for rejection. If the applicant has not addressed the reasons adequately, a final rejection email/letter will be sent to the applicant. This final rejection communication will state the reasons listed in the first communication, the review of the additional information, and the reasons why the decision was not overturned.

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All of this activity with appeals will be tracked in the Appeals Log for the grant and also in the student record.

### **Detection and Prevention of Fraud, Waste, and Abuse Policies and Procedures**

Through Valencia College's grants management process, monitoring systems and internal controls governed by the Valencia College Resource Development, our goal is to mitigate risk and prevent fraud, waste and abuse. If a program staff becomes aware of potential or actual fraud, waste or abuse, a report can be made to the Director of Compliance and Audit via email or telephone. The report can anonymous at the discretion of the individual. Fraud complaints will be managed in accordance with the College policy 6Hx28:1-10 at the following link:

<https://valenciacollege.edu/about/general-counsel/policy/documents/volume1/1-10-policy-against-improper-activities-whistleblower-protection.pdf>

Allegations of fraud, waste and abuse can also be made to DEO's Office of the Inspector General via email at [OIG@deo.myflorida.com](mailto:OIG@deo.myflorida.com) or telephone at 1-855-456-0650. Complaints may also be made to the Housing and Urban Development's Office of the Inspector General Fraud Hotline at (850) 245-7135 or email at [OIG@deo.myflorida.com](mailto:OIG@deo.myflorida.com).

### **Mandated Conditions-Excessive Force Policy**

This requirement does not apply at Valencia College. Valencia College does not have a sworn police force like other state institutions. Valencia College has hourly security employees who are not authorized to use any force at all. Valencia College is also not covered by the Housing and Development Act; that applies only to a "city, county, town, township, parish, village, or other general purpose political subdivision of a State." Valencia College is a special purpose political subdivision of Florida existing for the sole purpose of providing public post-secondary education as defined in Florida Statute Section 1001.60.

## APPENDIX A



### Applicant Identification

(must be a photo ID)



- Driver License; OR
- State- or Federal-issued ID; OR
- U.S. Passport; OR
- Permanent Resident Card; OR
- Employment Authorization Card

### Documentation of Other Forms of Assistance

(Provide all that apply.)

- FEMA award letter
- SBA award letter
- Educational assistance award letter
- VOAD, non-profit, or other award letter

### Proof of Current Address

- Deed, mortgage, or monthly mortgage statement; OR
- Rental agreement; OR
- Florida vehicle registration or title; OR
- Florida Voter Registration Card; OR
- W-2 Form or 1099; OR
- Utility bill; OR
- Automobile or homeowner's insurance policy or bill; OR
- Medical or health card with address; OR
- Statement from financial institution; OR
- Letter from shelter or half-way house verifying applicant lives at address; OR
- Educational transcripts

### Income Documentation for All Adult Household Members (18+)

- Most recent tax returns (IRS 1040, 1040A or 1040EZ) signed and submitted; OR
- Documentation of Income:
  - Salary/Wage/Tips: Last 3 months of pay stubs OR signed statement from employer stating wage and frequency of payment.
  - Self-employment Income: IRS 1099, profit/loss statement, or ledger.
  - Interest, Dividends: IRS 1099 DIV or account/holding statements.
  - Benefits: Social security or disability, retirement, SSA, TANF, Veterans', alimony, pension or annuity current letter of benefits (should include benefit amount).
  - Unemployment Income: current letter of benefits or printouts (should include benefit amount).
  - Workers Compensation Income: letter of benefits from insurance company or court (should include benefit amount).
  - Documentation of any other sources of income received regularly.

[www.RebuildFlorida.gov](http://www.RebuildFlorida.gov)



## Workforce Recovery Training Program Application Document Checklist



### Additional Documentation

(if applicable)

- If applicant is disabled, provide one (1) of the following:
  - Social Security Disability Statement
  - Letter from doctor stating applicant qualifies as disabled
  - Verification of Disability Form
- If applicant is a Veteran or active duty spouse or dependent, provide DD Form 214, military identification card, or other recognized documentation.

### Certifications and Authorizations

- Consent and Release of Personal Information Form
- Fraud Acknowledgement Regarding False or Misleading Statements Certification

### Helpful Information:

- After your initial application is submitted, your application will be reviewed by the program partner(s) you selected. A team member will contact you if any additional documentation is required.
- Translation services are available by contacting one of the WRTP program partners:
  - CareerSource Brevard  
321-394-0511
  - The College of the Florida Keys  
305-809-3238
  - Florida International University  
305-348-3537
  - Florida State College at Jacksonville  
904-361-6251
  - Hendry County School District  
863-983-1511
  - Indian River State College  
772-462-7546
  - Valencia College  
407-582-6700
- All information provided to the WRTP will be verified.
- For additional information and updates, visit [www.RebuildFlorida.gov](http://www.RebuildFlorida.gov).

Information subject to change. Last revised: July 15, 2020.

[www.RebuildFlorida.gov](http://www.RebuildFlorida.gov)

## APPENDIX B



### CONSENT AND RELEASE OF PERSONAL INFORMATION

Applicant Name	County
Address	City, State Zip Code
Phone	Email

Applicant acknowledges that previous or current personal information may be necessary to process Applicant's Workforce Recovery Training Program application. Verifications and inquiries that may be requested include, but are not limited to: personal identity, insurance claim information, bank and financial records, tax returns, employment, property records, income and assets. Applicant hereby consents and authorizes the Rebuild Florida Program, its agents, contractors and assigns to request, access, review, disclose, release and share personal information – including any private or confidential information which is not subject to public disclosure but is necessary to process the application. Applicant further acknowledges that any party disclosing information to Rebuild Florida is not responsible for any negligent misrepresentation or omission, and Applicant agrees to hold such parties harmless from and against all claims, actions, suits or other proceedings, and any and all losses, judgments, damages, expenses or other costs (including reasonable attorneys' fees and disbursements), arising from or in any way relating to their disclosure. Applicant further acknowledges that the information gathered may be released to any other governing agency responsible for auditing Rebuild Florida including, but not limited to the Department of Housing and Urban Development (HUD) or the Office of Inspector General (OIG). This form will remain valid until revoked in writing.

#### PRIVACY POLICY

The Applicant acknowledges that he/she has received and reviewed the Rebuild Florida's privacy policy as it relates to the Applicant's personal information and the Applicant's right to privacy. Rebuild Florida's ability to access the Applicant's personal information is a condition of participation in Program.

Applicant Signature
Applicant Printed Name
Date



APPENDIX C



**FRAUD ACKNOWLEDGEMENT REGARDING FALSE OR MISLEADING STATEMENTS**

_____ Applicant Name	_____ County
_____ Address	_____ City, State Zip Code
_____ Phone	_____ Email

- a) NOTICE: Applicant is hereby notified that intentionally or knowingly making a materially false or misleading statement relating to the Program could result in ineligibility for benefits, action to recover any Program benefits paid to or on behalf of Applicant, and/or a referral to criminal law enforcement.
- b) Applicant represents that all statements and representations made by Applicant regarding any other disaster recovery funding received by Applicant have been and shall be true and correct.
- c) Applicant hereby represents that the Applicant has received, read, and understands this notice of penalties for making a materially false or misleading statement to obtain Program benefits.
- d) In any proceeding to enforce this grant agreement, the State shall be entitled to recover all costs of enforcement, including actual attorney's fees.

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Applicant Printed Name

\_\_\_\_\_  
Date



ATTACHMENT A  
FINANCIAL MANAGEMENT PROCEDURES



ATTACHMENT B  
MONITORING PROGRAM PERFORMANCE PROCEDURES

ATTACHMENT C

SECTION 3 PROVISIONS FOR CONTRACTS AND SUBCONTRACTORS

The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. § 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are Subrecipients of HUD assistance for housing.

The Parties to this contract agree to comply with HUD's regulations in 24 CFR part 75, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 75 regulations.

The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 75, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 75. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 75.

The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 75 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 75.

Noncompliance with HUD's regulations in 24 CFR part 75 may result in sanctions, termination of this contract for default and debarment or suspension from future HUD assisted contracts.

With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. § 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b). Procurement and Contracting Policy.