

TRIDENT

Trident Workforce Investment Board Workforce Investment Act

ASSESSMENT, BACKGROUND AND DRUG SCREENING POLICY

TO: SC Works Trident Operators and Youth Contractor

ISSUANCE DATE: March 11, 2014

EFFECTIVE DATE: March 11, 2014

SUPERSEDES: August 14, 2012, May 15, 2012, July 1, 2010, September 23, 2009

SUBJECT: Assessment, Background and Drug Screen Policy

PURPOSE:

The purpose of this policy is to establish the principles and guidelines for assessments, criminal background checks, testing and sanctioning for the use of illegal substances of adults, dislocated workers and youth customers enrolled in WIA funded programs.

POLICY:

Accurate and ongoing assessment is a key element in all WIA funded programs to assure job seekers' successful employment and self-sufficiency. It is mandatory that all youth be assessed for basic skills deficiency. The Trident Workforce Investment Board (TWIB) has made it mandatory for all adults and dislocated workers be assessed for basic skills deficiency. It is mandatory for all adults and dislocated workers be assessed in aptitude, career interest and for barriers to training and/or employment. Each customer must fully understand what the assessment process includes, its purpose and how it applies to their employment goals.

PROCEDURES:

Assessments:

All Adults, Dislocated Workers and Youth entering WIA funded programs must have assessments as outlined above under the Policy. The SC Works Trident System has established that all customers seeking to enter training services must make a minimum WorkKeys score of "4" on the Career Readiness Certificate (CRC) WorkKeys assessments (Reading for Information, Applied Math and Locating Information) unless the provider of training and/or prospective employer has established a different score.

Testing for Illegal Substances and Background Checks:

1. WIA participants may be required to be drug screened for the use of illegal substances prior to entering certain training programs.
2. WIA participants may be required to have a criminal background check prior to entering certain training programs. An individual who has a criminal background will not be denied enrollment in the WIA program and/or training based solely on their criminal history.
3. Participants who test positive for the use of illegal substances must be referred to the local Alcohol and/or other Drug Abuse Service Agency. Before a customer returns to continue training services with WIA, verification along with a recommendation from the local Alcohol and/or other Drug Abuse Service Agency must be received. The Participant is expected to follow recommendations from the agency before any training services will be provided.
4. Should a customer deny the use of illegal substances and they wish to be retested, the following must occur: A request should be submitted for initial screen to be retested and have a toxicology (confirmation) test done. If retest comes back confirmed, participant must follow steps outlined in #3. Should the customer want to pursue testing on his/her own, WIA will only accept results from a certified Drug Screening Facility and the screening must occur within 24 hours of customer receiving the results of the initial test. WIA will not cover this cost.

According to the US Department of Labor (DOL), federal funds, which include WIA funds, cannot be used to pay for a drug screening test unless it is required by the training provider. As a result, in order to demonstrate and show we are compliant with this federal mandate, all drug screening tests must be included on the training ledger. WIA funds cannot be used to pay for training in an occupational field or area for which an individual is not employable. Therefore, if it is determined a criminal background issue would prevent employment in an occupational field or area, WIA funds cannot be used to pay for training in that occupational field or area. To determine whether a criminal background issue would prevent employment in an occupational field or area, a minimum of seven (7) employers in the occupational field or area should be surveyed to determine if the criminal background issue would prevent employment in the field. No personal identifying information (PII) of the customer may be shared with the employers. This information should be documented and kept in the separate confidential folder. A generic case note should be created in the SC Works Online System (SCWOS) of customers not able to attend the training. A positive result on the drug screening may also prohibit or delay admission into certain WIA training programs. Prior to acceptance into any WIA training program, the results on the criminal background check and drug screening test must be received, reviewed and deemed acceptable for the training in which the customer wishes to pursue.

Ongoing customer assessment includes:

- Target employability skills
- Identify individual strengths and needs
- Establish measurements used to document progress toward retaining employment and self-sufficiency

Acceptable assessment methods, using one or more of the following tools or strategies, include:

- Standardized, nationally recognized tests (WorkKeys)
- Structured interviews
- Inventories
- Self-Assessment Checklists

Evidence of criminal backgrounds and drug screenings must be maintained in a separate confidential file according to EO standards. All other assessments must be maintained in customers' regular hard file. WorkKeys results must be entered in the assessment section in SC Works Online System (SCWOS).



Ronald E. Mitchum, Executive Director
BCDCOG

March 11, 2014

Date