

UNITED STATES VIRGIN ISLANDS HOUSING FINANCE AUTHORITY

WORKFORCE DEVELOPMENT POLICY

VERSION: 1.0

April 5, 2018

Prepared by:

Virgin Islands Housing Finance Authority



The policies stated in this manual are current as of April 5, 2018. This Manual represents the current version of the Virgin Islands Housing Finance Authority's (VIHFA) policies which shall provide general guidance for the operation of the Workforce Development Program. All manuals will be reviewed periodically and will be updated. Therefore, you are strongly urged to visit our website www.vihfa.gov/cdbg-dr or to ensure that you have the latest version. There may be times, however, when a policy or procedure will change before the manual is revised.

Table 1: Workforce Development Program Version Control

VERSION NUMBER	DATE REVISED	DESCRIPTION
VERSION 1 (DRAFT)	2/15/2019	Workforce Development Policies
VERSION 1	4/5/2019	Crosscutting requirements removed for separate Appendix

DRAFT

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1.1 Version History

Version Policy

Version history is tracked in Table 1, with notes regarding version changes. The dates of each publication are also tracked in this table. The first version of this document is 1.0.

Substantive changes within this document that reflect a policy change will result in the issuance of a new version 2.0, an increase in the primary version number. Future policy changes will result in additional revision and the issuance of a new primary version number.

Non-substantive changes such as minor wording and editing, or clarification of existing policy, that do not affect the interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase behind the primary version number. Such changes would result in a version number such as 2.1, 2.2, etc.

Policy Change Control Board

Policy review and changes for the Workforce Development Program are considered through a change control process. When policy clarifications, additions, or deletions are needed to more precisely define the rules by which the Program will operate, Program staff will submit a Policy Change Request Form or a Request for Decision Form for internal review by the Policy Change Control Board (PCCB). Within the PCCB, two members will separately perform a review to verify that all relevant information and any supporting documentation are included in the request. Upon PCCB concurrence by these two members that the request raises a policy issue, rather than a process issue, the Policy Change Request Form or Request for Decision is forwarded to VIHFA for review. The requests are compiled and brought before the entire PCCB for a final policy change determination.

The PCCB is composed of the Chief Operating Officer, the Economic Revitalization Senior Manager, CDBG-DR Director, Special Counsel for Disaster Recovery, along with other VIHFA staff members representing VIHFA leadership, legal, and policy specialists. At least one Subject Matter Expert working in a policy area or task area that will be affected by the PCCB decision will be invited to assist in policy evaluation, if necessary.

The PCCB meets regularly to consider all pending requests that have been submitted via the previously described process. The PCCB meets bi-weekly or as frequently as is necessary to consider policy decisions critical to moving the Program forward timely. The schedule for PCCB meetings is expected to move to a lower frequency as the Program matures.

1.2 Agencies and Acronyms

ADA – Americans with Disabilities Act

AFWA – Anti-fraud, Waste, and Abuse

CDBG-DR – Community Development Block Grant Disaster Recovery

DBRA – Davis Bacon and Related Acts

DRGR- Disaster Recovery Grant Reporting System

DHS – Virgin Islands Department of Human Services

DOB – Duplication of Benefits

DPP – Virgin Islands Department of Property and Procurement

EFL – Educational Functioning Levels

ESL – English as a Second Language

ETP – Eligible Training Provider

GDP – Gross Domestic Product

GVI – Government of the Virgin Islands

HCDA – Housing and Community Development Act

HUD – Department of Housing and Urban Development

ITA – Individual Training Account

LAP – Language Access Plan

LEP – Limited English Proficiency

LMI – Low- and Moderate-Income

M/WBE – Minority/Women-owned Business Enterprise

OJT – On-the-Job Training

OSHA – Occupational Safety and Health Administration

QSR – Quarterly Status Report

RA – Registered Apprenticeship

TA – Technical Assistance

VIDOL – Virgin Islands Department of Labor

VIHFA – Virgin Islands Housing Finance Authority

WIOA – Workforce Investment and Opportunity Act

1.3 Definitions

Action Plan - A plan to guide the spending of a HUD CDBG-DR grant award to address unmet housing, economic, and infrastructure needs after a disaster.

Allocation: 1) Amount of a grant award that has been determined for a particular grantee, partner agency or sub-recipient. 2) Amount of funding attributed to a program.

Community Development Block Grant – Disaster Recovery (CDBG-DR): Assistance from HUD to help the Territory recover from presidentially declared disasters, especially in low-income areas, subject to availability of supplemental appropriations.

Cross-cutting regulations: Regulations outside of CDBG-DR regulations that apply to CDBG-DR programs. These include regulations pertaining to financial management, procurement, environmental, labor, acquisition, relocation, fair housing, and non-discrimination.

Davis-Bacon and Related Acts (DBRA): Federal law requiring payment of local prevailing wages as determined by the U.S. Department of Labor on public works projects. It applies to contractors and subcontractors performing work on federally funded or assisted contracts more than \$2,000 for the construction, alteration, or repair of public buildings or public works.

Duplication of Benefits (DOB): A duplication of benefit is the receipt of funding from multiple sources for the same purpose. The Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) prohibits any person, business concern or other entity from receiving financial assistance from CDBG Disaster Recovery funding with respect to any part of the loss resulting from a major disaster as to which he/she has already received financial assistance under any other program or from insurance or any other sources. It is an amount determined by the program that may result in the reduction of an award value.

Eligible Activity: Activities eligible to be assisted under the CDBG program. All CDBG-DR grantees must: (1) use CDBG funds only for activities that fall under an authorized category of basic eligibility; (2) properly classify the activity; and (3) provide adequate documentation as required by the category it selects for each such activity.

Grantee: HUD grantees receive funding from HUD to support HUD's mission to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD grantees include state and local governments, non-profit and for-profit organizations, public housing authorities, and tribal entities.

Gross Domestic Product (GDP) - A monetary measure of the market value of all the final goods and services produced in a period of time, often annually or quarterly.

Housing and Community Development Act of 1973 (HCDA) - The HCDA created the CDBG Program by merging 7 categorical programs into a block of flexible community development funds distributed each year by a formula that considers population and measures of distress including poverty, age of housing, housing overcrowding, and growth lag. Grantees now determine what activities they will fund as long as certain requirements are met, including that each activity is eligible and will meet one of the three broad national objectives of the program.

Implementing Partner (Partner): Territorial agencies that are provided CDBG-DR funds by a grantee for their use in carrying out agreed-upon, eligible activities through an Subrecipient Agreement with VIHFA.

Low- to Moderate-Income (LMI): A household is of low-or moderate-income if the household income (including income derived from assets) is at or below 80 percent of an area's median income. All income is based on the Area Median Income limits set annually by HUD for each parish or metropolitan statistical area.

National Objective: The authorizing statute of the CDBG program requires that each activity funded, except for program administration and planning activities, must meet one of three national objectives. The three national objectives are: 1) Benefit to low- and moderate-income (LMI) persons; 2) Aid in the prevention or elimination of slums or blight; and 3) Meet a need having a particular urgency (referred to as urgent need). An activity that does not meet a national objective is subject to recapture.

Section 3: A provision of the Housing and Urban Development Act of 1968 (HCDA) that requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.

Section 504: A provision of the Rehabilitation Act of 1973 which provides that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Subrecipient: Non-profits and limited for-profits that are provided CDBG-DR funds by VIHFA for their use in carrying out agreed-upon, eligible activities through a Subrecipient Agreement with VIHFA.

Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) – Public Law 100-707, signed into law November 23, 1988; amended the Disaster Relief Act of 1974. This Act constitutes the statutory authority for most Federal disaster response activities especially as they pertain to FEMA and FEMA programs.

Tranche: A segment of the total HUD grant award that is allocated based on specific requirements and expectations through a Federal Register Notice and supplemental HUD guidance.

2.0 INTRODUCTION

In the wake of the storms, the President announced a Major Disaster Declaration for Irma (DR-4335) and another for Maria (DR-4340) to make federal disaster assistance available to the Territory. In response, Congress approved the Supplemental Appropriations for Disaster Relief Requirements, 2017 (Pub. L. 115-56) on September 8, 2017, which made available \$7.39 billion in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to assist in long-term recovery from 2017 disasters. On February 9, 2018, Congress approved a bill appropriating an additional \$28 billion CDBG-DR funds, of which \$11 billion was set aside to address the remaining unmet needs including those of the U.S. Virgin Islands and Puerto Rico from Hurricane Maria.

In the U.S. Virgin Islands Action Plan and subsequent amendments (<https://www.vihfa.gov/disaster-recovery/action-plan>), the Government of the Virgin Islands (GVI) allocated \$5,000,000 from Tranche 1 and \$5,000,000 from Tranche 2 to the Workforce Development Program. This program will provide qualified low- and moderate-income (LMI) residents the opportunity to receive job readiness training, on-the-job training (OJT), or customized training. Workforce-ready residents will ensure many of the jobs created through the reconstruction effort can be filled by local community members and contribute to comprehensive economic recovery for the territory.

This policy document explains the structure of this program, requirements for the Virgin Islands Department of Labor (VIDOL), eligibility criteria for training providers and program participants, and supporting documentation for program eligibility determination.

3.0 WORKFORCE DEVELOPMENT PROGRAM OVERVIEW

Hurricanes Irma and Maria had profound and lasting effects on the already fragile economy of the U.S. Virgin Islands. Prior to the devastating 2017 storms, the Territory had lost its largest private employer, the oil refinery HOVENSA. Since HOVENSA's closure, the U.S. Virgin Islands has become increasingly reliant on tourism and, despite continued efforts, it has only made modest progress to diversify the economy and attract new businesses. Tourism remains by far the largest contributor to employment and *GDP*, with estimates ranging between 30% in direct economic impact and 80% in indirect impacts, and most small businesses and workers in the Territory are directly or indirectly dependent on tourism. Many of these individuals are of low- or moderate-income and lost their home, as well as their job; making it even more critical to find ways to allow them to regain both economic stability and secure housing.

To maximize the potential of local residents to secure jobs and contracts in the recovery efforts, the Territory will focus on ways to diversify the economy and develop workforce-ready residents as a way to make the U.S. Virgin Islands more resilient to future economic shocks. The program matches qualified, disaster-impacted residents to jobs with territory agencies and vendors working on recovery efforts.

The Workforce Development Program is a centerpiece of the approach to Economic Revitalization proposed in the Action Plan. This program will fund sector-based workforce development that includes the many actors along the workforce development spectrum such as training providers,

educational institutions, and employers to ensure a pipeline from training to job placement. Eligible entities will include vocational training organizations, established providers such as universities and employers with the goal of creating and supporting partnerships to develop a workforce training and placement program for Virgin Islanders. The initial focus of this program will be on training LMI residents to fill the construction and other related jobs that will be created as federal recovery funds come to the Territory. At present, the U.S. Virgin Islands has virtually no certified vocational training programs, which severely limits workers' access to higher-paying jobs. The Workforce Development Program addresses this gap with a demand-driven approach to vocational training focused on training and job placement.

The immediate workforce needs of recovery and rebuilding initiatives in the Territory represent both a challenge and an opportunity with the potential to benefit hundreds of residents across the U.S. Virgin Islands. This effort seeks to ensure that low- and moderate-income residents have access to the training needed to take advantage of these opportunities and the additional supports are made available to ensure they will be successful long-term. The Action Plan calls for the expenditure of approximately \$297 million for housing programs, not taking into consideration the construction activities already underway by FEMA. Given the pressing need for housing, these programs will be the first to ramp up. By placing an emphasis on recruitment and training of construction workers as soon as possible, these residents will be well positioned to take advantage of these early construction opportunities.

The experiences of disaster-impacted areas in New Jersey, Louisiana, Texas, Florida, and New York show that recovery and rebuilding efforts can last for several years. Training the local workforce to meet the needs of disaster relief construction and related projects is key to maximizing the benefits for local residents and also to reduce the cost of reconstruction. Absent enough skilled labor in the Territory, contractors are led to mobilize workers from outside the Territory at significant cost and at the expense of much-needed job opportunities for local workers. Furthermore, given the need to temporarily house workers from outside the territory, and given the decreased stock and availability of hotel rooms as described in the Action Plan, the training of local residents in construction trades and other skills needed to aid disaster relief efforts can mitigate the pressure outside labor will likely place on the existing, constrained supply of rental housing.

3.1 Workforce Development Initiative

The Workforce Development Program will offer training opportunities for LMI residents in the most in-demand sectors for the Territory, with an emphasis in disaster related sectors.

Funding for these activities will strengthen collaborations between workforce, education and training centers, and employers with a shared goal of providing solutions to promote growth and stability of the local economy. Several pathways will be developed jointly to ensure that training is timely and relevant. VIHFA partners, sub-recipients and vendors will be encouraged to hire local residents towards that goal and comply with Section 3 of the 1968 HUD Act, and U.S. Executive Order 11246.

3.2 Training Options

Training options may be stand-alone activities or used in tandem with other work-based training; with a mix of classroom training or with career services. They may be one component of a participant or employee's individual service strategy that leads to successful unsubsidized employment. They may be used as a part of a larger workforce development strategy for employers.

3.2.1 Job Readiness

The Job Readiness training and courses will provide a variety of pre-employment skills building, academic, and vocational skills trainings to ensure residents are better prepared for the workforce. Funds from the Workforce Development Program may be used to purchase equipment, supplies, and technology required for specific vocational programs only for nonprofit or public training providers that are physically located in the U.S. Virgin Islands.

3.2.2. On-the-Job Training

The On-the-Job Training (OTJ) pathway consists of work-based, experiential training to participants in a job setting. Employers temporarily hire participants and provide training to help them better perform a position. The Territory will use this training to enhance employment opportunities for job seekers who need both skill training and employment history in order to advance in the workplace. OTJ will be promoted to employers as workplace tools to build, expand or enhance business opportunities within the local community.

3.2.3 Customized Training

Customized Training is training designed to meet the special requirements of an employer (including a group of employers) conducted with a commitment by the employer(s) employ individuals upon successful completion of the training resulting in permanent employment for low-to moderate-income persons. The employer pays a significant portion of the cost of training as determined by VIDOL Program staff, taking into account:

- The size of the employer;
- The number of employees participating in training;
- Wage and benefit levels of those employees; and,
- The relation of the training to the competitiveness of a participant and other employer provided training and advancement opportunities.

Customized training does not have to result in an industry recognized credential, but training curricula used should reflect current industry standards.

3.3 Method of Distribution

Eligible Activities: 105(a)(8) Public Services, 105(a)(17) Assistance to For-Profit Businesses

Low- and Moderate-Income Projection: At least 51% of participants of the Workforce Development Program will be LMI.

Estimated Start and End Dates: Quarter 1, 2019 through Quarter 3, 2023.

National Objectives: Low- and Moderate-Income Limited Clientele or Low- and Moderate-Income Jobs

Geographic Area(s) Served: St. Thomas/St. John District and St. Croix District

Program Allocation: \$10,000,000 (5,000,000 (initial allocation), \$5,000,000 (second allocation))

3.4 Program Implementation

3.4.1 General Program Oversight

VIHFA will oversee all activities and expenditures in connection with the CDBG-DR funds and will ensure that the program meets all requirements, including but not limited to: the disaster threshold, eligibility, national objective, compliance, fair housing, labor standards, Section 3 goals, nondiscrimination, and procurement regulations.

VIHFA has a monitoring plan in accordance with CDBG-DR requirements so that each activity funded will meet the disaster threshold and one of HUD's three national objectives, with emphasis on eligible activities achieving the primary national objective of benefiting LMI persons.

All programs must comply with any applicable federal laws and regulations and effectively meet their stated goals. VIHFA will monitor funds using the Monitoring and Compliance Manual. In accordance with HUD requirements, VIHFA will submit a Quarterly Progress Report (QPR) through Disaster Recover Grant Reporting System (DRGR). QPR's will be posted on a quarterly basis on VIHFA's website until all funds have been expended and all expenditures have been reported.

3.4.2 Roles and Responsibilities

3.4.2.1 VIHFA

VIHFA administers the grant funds for the Repair and Resilience Program through the CDBG-DR Division. Division staff are responsible for ensuring projects comply with all applicable federal and Territorial regulations, including but not limited to, Pub. L. 115-56, Pub. L. 115-123, NEPA, HCDA, and Territorial procurement regulations where applicable, and align with the CDBG-DR Action Plan. Division staff provide technical assistance to Implementing Partners to meet these requirements as needed. VIHFA's responsibilities include:

- Determine sufficient capacity and payment procedures for Implementing Partners
- Determine program eligibility and mechanisms to comply with crosscutting requirements
- Disburse funds in accordance with VIHFA Financial Policies
- Complete desk, onsite, and formal monitoring of the project
- Prepare and maintain documentation of activities and compliance with requirements for monitoring and audits.

3.4.2.2 Implementing Partner

VIDOL is the Implementing Partner under the Workforce Development Program and serves as the entity managing and executing the program activities. VIDOL can request funds from the Workforce Development Program by submitting the Initial Scope and Budget Form to VIHFA (Appendix B). The Implementing Partner's responsibilities include:

- Meet the requirements of VIHFA Capacity Assessments and grant conditions
- Manage all aspects of program implementation
- Responsibly manage project funds
- Coordinate activities with other federal and Territorial agencies
- Implement crosscutting requirements
- Report back to VIHFA monthly basis
- Prepare and maintain documentation of activities and compliance with requirements for monitoring and audits.

3.4.2.3 Eligible Training Providers (ETPs):

ETPs are approved training providers, contracted through VIDOL, and are the primary recipients of funds from Job Readiness: Skills for Tomorrow Program. ETPs must:

- Demonstrate compliance with VIDOL's ETP List requirements
- Provide sign-in sheets and other documentation of participant attendance for any tuition assistance requested
- Assist VIDOL in tracking and reporting on participant performance during and in some cases after the completion of the training.

3.4.2.4 Employers

Employers are the primary recipients of funds for the On-the-Job/Customized Training Program. All interested employers will be asked to register with the VIDOL and will also be able to screen participants prior to hiring them. Employers must:

1. Provide documentation of participant/employee timesheets for any wage assistance requested
2. Assist VIDOL in tracking and reporting on participant/employee performance during and in some cases after the completion of the training.

3.4.2.5 Participants/Employees

Participants and Employees are the direct recipients of the training services provided. For the Job Readiness: Skills for Tomorrow Program, all beneficiaries will be participants in training courses provided by ETPs. In the On-the-Job/Customized Training Program recipients of training and job experience will either be a temporary participant, or a fully employed member of the Employer. In either case, participants and employees must:

- Register through VIDOL
- Be a resident of the U.S. Virgin Islands

- Self-certify income at the onset of their participation/employment
- May be asked to cooperate with data tracking and performance measures during and after their participation/employment

4.0 PROGRAMS

4.1 Job Readiness Program: Skills for Tomorrow

Purpose: To prepare a new generation of young individuals for the construction industry by providing them with basic skills and entry-level certification in order for them to take part in rebuilding the U.S. Virgin Islands community after the storms of 2017. Training will be available in both the St. Croix district and the St. Thomas/St. John district.

Strategy: Develop training opportunities that allow LMI participants to learn entry-level construction skills that give them a competitive edge when applying for and gaining employment on local construction projects. Participants will take part in a ten-week program where they will receive:

- Job readiness skills workshops – preparing for employment, dressing for the job, getting along with supervisors and peers, observing time and attendance;
- Basic Occupational Safety and Health Administration (OSHA) and work safety training;
- Comprehensive academic and aptitude assessments;
- Introduction to the Construction Industry course using the National Center for Construction Education & Research (NCCER) Core Curriculum with Certification;
- Entry level Occupational Skills training (student’s choice of focus) in plumbing, electrical, masonry, welding and carpentry;
- Job Preparation and Referral – Resume preparation and interviewing techniques

Rollout: This project seeks to train approximately 600 individuals over an eight-month period. Through a rigorous training schedule, cohorts of 100 (50 each district) will begin training every six weeks beginning in Spring 2019. Participants will be recruited by media advertisement, and VIDOL and V.I. Department of Human Services’ jobseeker databases. All participants will be screened by VIDOL. Successful candidates will start with job readiness workshops and continue through to completion of occupational skills training.

The job readiness workshops and academic/aptitude assessments will be conducted by VIDOL. Multiple training service providers will be available in each district to conduct the NCCER Core Curriculum and Occupational Skills training courses. Participants will have an opportunity to visit actual construction sites and engage in “light hands-on” activity during that time. Participants will return to VIDOL to develop resumes, learn interviewing techniques and engage in job search activities. Job fairs will be held to assist with employment as needed.

Outcome: Successful participants are now skilled as entry-level workers in an area of focus and holistically prepared for employment opportunities. Successful course participants are referred by

VIDOL and VIHFA to be hired by diverse businesses, agencies, and local contractors. Additionally, successful participants will be placed on a Section 3 referral list used by contractors and agencies for housing rehab, new construction, rental housing, public housing and infrastructure recovery projects as they occur to fulfill Section 3 goals of their contracts.

Proposed Schedule:

Activity	Duration
<ul style="list-style-type: none"> • Job readiness skills workshops – preparing for employment, dressing for the job, getting along with supervisors and peers, observing time and attendance; • Basic OSHA and work safety training; • Comprehensive academic and aptitude assessments; 	Two Weeks
<ul style="list-style-type: none"> • Introduction to the Construction Industry course using the NCCER Core Curriculum with Certification; 	Two Weeks
<ul style="list-style-type: none"> • Entry level Occupational Skills training (student’s choice of focus) in plumbing, electrical, masonry and carpentry; 	Six Weeks
<ul style="list-style-type: none"> • Job Preparation and Referral – resume preparation and interviewing techniques 	Two Days

4.2 On-the-Job Training/Customized Training

Purpose: To provide more advanced level training to LMI individuals to secure their participation in the on-going recovery efforts in the U.S. Virgin Islands.

Strategy: Form partnerships with local businesses to conduct work-based training opportunities in the construction, manufacturing, transportation and hospitality industries. Work-based training activities include on-the-job training, industry-recognized apprenticeship trainings, and customized trainings.

Participants under OTJ Training will:

- Be hired by the training provider and spend twenty weeks (5 months) in a paid work experience learning a specific skill;
- Receive supplemental classroom training to ensure subject matter knowledge;
- Receive hands-on instruction from employer;
- Be paired with a mentor in the industry;
- Be responsible for completing an “assignment” from the employer that signifies knowledge of theory and mastery of skill;
- Upon completion of the program, employers are required to continue the employment for a minimum of 90 days, after which, continued employment is at the discretion of the provider or participant.

Employees under Customized Training:

- Will receive training that will vary based on the needs of the employers
- Results in permanent employment
- Are already in or will be placed in permanent positions

Outcome: Participants will be job-ready and qualified in a specific trade/skill with intermediate level certification. At the completion of training, successful participants will be ready for unsubsidized employment.

Rollout: This project seeks to train 300 individuals over a fifteen-month period. Cohorts of 100 individuals (50 per district) will be placed every three months. Participants for work-based training opportunities will be recruited from the individuals who have successfully completed training in CDBG-DR Job Readiness Programs, from enrollments in other programs for LMI individuals, and from the VIDOL and Department of Human Services database of job seekers. All participants will be screened by VIDOL.

4.3 Eligibility Requirements

4.3.1 ETP Eligibility Requirements

VIDOL’s ETP List is open to a consortium of accredited educational institutions; certified vocational program providers; private businesses, including, but not limited, to those with in-house, certified on-the-job training programs; certified apprenticeship program providers and nonprofit workforce and soft skills providers; and/or other organizations approved for workforce training by the U.S. Virgin Islands Workforce Development Board through the Eligible Training Providers List (ETP List).

The ETP List is determined by an application process that collects information on the provider’s sector of training, curriculums, past demonstration of capacity, other funding sources for their programs, and Territorial certifications, licenses, and affiliations. Entities on the ETP List are procured through the Department of Property and Procurement according to Territorial procurement requirements.

The ETP List consists of providers prepared to offer training opportunities in the most in-demand sectors for the Territory:

- Administrative or Support Services
- Allied Health
- Construction Trades
- Information Technology
- Leisure and Hospitality
- Retail
- Transportation and Logistics

Providers currently on the ETP List requesting funds through this program will be subject to additional CDBG-DR requirements and must complete a revised application to ensure compliance

with CDBG-DR specific policies. All future training providers interested in being considered for the ETP List will also be required to meet CDBG-DR requirements to be eligible for funding from this program. Applications for the ETP List can be made on a rolling basis.

The Territory may create an additional option to support qualifying individual workers seeking vocational training not offered by the training providers otherwise funded through this program.

4.3.2 ETP Prioritization Criteria

Priority will be given to training providers that can meet the following conditions:

- Are listed as Eligible Training Providers through VIDOL
- Can provide programs serving predominantly LMI individuals;
- Are proficient in infusing “soft skills” development into its workforce readiness curricula
- A documented job placement program for trainees;
- A curricular plan that is demonstrably tailored to meet market labor demand and is clearly connected to a career path and available jobs, apprenticeships, and on-the-job training opportunities, and jobs anticipated due to recovery efforts; and
- When appropriate, incorporation of digital literacy, Limited English Proficiency accommodations, disability accommodations, and/or soft skills training in the program or curriculum.

4.3.3 Participant and Employee Eligibility

Participants and employees receiving training through CDBG-DR funding must be:

- At least 16 years of age
- Resident of the Territory

The Workforce Development Program may fund training services to both adults and young adults to increase opportunities for job seekers to access services and resources that strengthen their ability to obtain and maintain employment in a rapidly changing employment environment. Age documentation will be collected as part of the application process.

4.3.4 Participant and Employee Prioritization

- Low- and moderate-income
- Pre-requisites of the courses
- Other barriers to employment

It is not required participants be LMI persons, however, LMI persons will be heavily prioritized. Incomes will be provided during the application through a self-certification form. VIDOL may require additional verification documentation on a case-by-case basis.

Pre-requisites will vary by training provider and course, as well as the needs of the employer. To better match eligible participants and employees to a training program, VIDOL will collect information on education level, income, skill levels, and other key information on the individual. This information will be stored in an Individual Training Account (ITA) within VIDOL. Potential participants and employees will complete a General Assessment of Instructional Needs (GAIN) Aptitude Test with VIDOL to better assess their instructional readiness. The GAIN test is approved

by the National Reporting System to assess the Educational Functioning Levels (EFL) of English and math skills.

Based on the results of this test and the information collected in the ITA, participants will be matched to the applicable course or training provider. Access to services will be given first to eligible individuals who are unlikely to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, as demonstrated by information in the ITA.

If participants do not meet the minimum pre-requisites of a course, VIDOL may first enroll the individual in separate job preparation courses or services administered by the agency under other funding sources until they are prepared to meet requirements for CDBG-DR funded trainings. Therefore, inability to meet course pre-requisites does not disqualify the potential participant from the course, rather, gaps in skills will be addressed under existing Territorial programs and the CDBG-DR Workforce Development Program will postpone the participant or employee's application to the next relevant cohort.

5.0 CDBG-DR PROGRAM REQUIREMENTS

The Territory will ensure that each project which receives funding under the Workforce Development Program corresponds to a CDBG-DR eligible activity, meets a national objective, and demonstrates a tie to the disaster. Funds will be provided as payment to governmental agencies, eligible organizations, or other entities for eligible activities.

5.1 Tie to the Disaster

All activities funded with CDBG-DR in the Workforce Development Program must in some way respond to a direct or indirect impact of one of the following federally-declared disasters:

- Hurricane Irma ([DR-4335](#))
- Hurricane Maria ([DR-4340](#))

While not all trainings and employment opportunities created through this programming will have a direct tie to the storm, developing skilled workers to revitalize the economy is a critical component of recovery. U.S. Virgin Island's economy was heavily damaged by the storms, based on analysis of aggregated lost wages, lost government tax revenue, and damage to commercial property. As detailed in the Action Plan, the combination of these indicators reflects approximately \$1.57 billion in damages from the two storms.

Broad-based workforce opportunities will contribute to comprehensive strengthening of the economy by providing family-sustaining wages and new skills targeted for vulnerable populations. More qualified, local workers will be able to participate directly in the recovery through the growing demand for construction labor to rebuild homes, buildings, and roads. Efforts to revitalize tourism in the U.S. Virgin Islands will also create additional hospitality, tourism, and retail business opportunities. Local firms will need to have a more reliable, workforce-ready pool of employees to invest in new and growing business opportunities.

Workforce development activities allow both individuals and businesses to be better able to recover from losses and costs incurred by the storms.

Therefore, an enhanced workforce is vital to recovery of the Territory. For this Program, a tie to the disaster is constituted by the training provider’s ability to provide training and job opportunities to LMI persons.

5.2 Eligible Activities

The table below summarizes the total infrastructure CDBG-DR allocations in accordance with basic eligible activities per HCDA Section 105:

Table 2. Eligible Activities

Program	Sectors	HCDA Eligible Activities (Section 105(a))	Total Allocation
Workforce Development Program	<ul style="list-style-type: none"> • Administrative or Support Services • Allied Health • Construction Trades • Information Technology • Leisure and Hospitality • Retail • Transportation and Logistics 	<ul style="list-style-type: none"> • Public Services • Assistance to For-Profit Businesses 	\$10,000,000

5.3 National Objectives

Per HUD 24 CFR 570 Section 101(c), the primary objective of the Program is the development of viable communities by the provision of decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. The statute further states that this is to be achieved in the CDBG program by ensuring that each funded activity meets one of three named national objectives. Those three objectives are identified as: benefiting low- and moderate-income persons; preventing or eliminating slums or blight; and meeting urgent needs. Federal Register FR-6109-N-01 states that each grantee must ensure that at least 70% of all CDBG-DR funds must be used for activities qualifying under the national objectives of Benefit to Low- and Moderate-Income Persons. The following national objectives are applicable to all Infrastructure Programs and all projects will be required to meet at least one of the national objectives below.

National Objectives: Low- and Moderate-Income Limited Clientele or Low- to Moderate-Income Jobs

5.4 Duplication of Benefits

The Workforce Development Program will include a duplication of benefits (DOB) review as part of the scope and budget review and award calculation process. The requirements of the

Robert T. Stafford Act (Stafford Act), as amended, prohibit any person, business concern, or other entity from receiving federal funds for any part of such loss for which they have already received financial assistance under any other program, private insurance, charitable assistance, or any other source.

5.4.1 Preventing Duplication

VIDOL must complete DOB calculations as part of both the Initial Scope and Budget, as well as the Detailed Scope and Budget Form, with assistance from CDBG-DR Division staff. Both forms request information about all other sources of funding the agency must be aware of that may impact the DOB. For all CDBG-DR programs, agencies must provide documentation of these sources but VIHFA will also verify these funding sources with other federal partners. This process will be supported by technical assistance (TA) from Program staff. Also included in these forms is the standard calculation method used by Program staff to determine if a federal funding duplication is present.

VIHFA is ultimately responsible for ensuring that project participants comply with all federal laws and regulations.

VIDOL is responsible for verifying there is no duplication of resources, such as charitable or public grants pertaining to workforce training. Additionally, CDBG-DR funds may not be used to supplant local resources used for workforce development programs.

Program participants and employees will be required during the application process to certify they are not receiving additional funding, such as charitable contributions, scholarships, or other sources of financial assistance for workforce training.

VIDOL reviews reported DOB and makes appropriate deductions. VIHFA maintains records in accordance with Federal grants requirements and assures that the agency has accurately completed DOB reviews and made deductions as appropriate. Project DOB information must be maintained by VIDOL and reported to VIHFA throughout the life of the project. Reporting should occur at any point that such information becomes available, including:

- During scoping process development, pre-award, and approval;
- During the grant period of performance;
- During closeout; and
- After grant closeout, if duplicative funds are received at a later date.

5.4.2 Recapture

An applicant may be required to repay all, or a portion of the funds received. The reasons for recapture include but are not limited to the following:

- An Implementing Partner or subrecipient is determined to have provided false or misleading information to the Program;
- An Implementing Partner or subrecipient withdraws from the program prior to completion of the project;
- An Implementing Partner or subrecipient does not complete the project;

- An Implementing Partner or subrecipient fails to meet a national objective of the program;
- An Implementing Partner or subrecipient is found to have used program funds for an ineligible activity; and/or,
- An Implementing Partner or subrecipient does not report the receipt of additional insurance, SBA, FEMA, non-profit assistance and/or any other duplication of benefits received after award.

The Program will develop a detailed recapture policy for the overall CDBG-DR program. The policy, once developed, will be referenced in an update to this manual.

6.0 ADDITIONAL SUPPORTIVE SERVICES

In addition to the cost of training such as tuition and books, there are other costs associated with attending training, particularly depending on the participant or employer's location. The VIDOL may provide supportive assistance to facilitate successful program completion to eligible candidates.

Transportation: Transportation allowance is provided for miles traveled to and from the training site from the participant's residence. Participants living in one town and traveling to another town for CDBG-DR training activities may receive \$6.00 per day on St. Croix and \$4.00 per day on St. Thomas. Transportation cost is reimbursed in accordance with the participant's schedule. Participants living in St. John and seeking training services in St. Thomas will be reimbursed for the rate of ferry transportation and \$4.00 for transportation once on St. Thomas.

Childcare: Participants in need of childcare supportive services are required to complete a childcare request form. Payments for childcare shall not exceed \$60.00 per week or a maximum of \$300.00 per month for the care of each dependent up to five (5) years of age.

7.0 OUTREACH AND ADVERTISING

The Territory and VIHFA are committed to affirmatively furthering equal opportunities through established affirmative marketing and outreach activities. VIHFA Citizen Participation Plan includes the agency's overarching affirmative marketing and outreach policies and activities for consolidated planning, much of which will also be required for program outreach. The applicable constituency groups that will be targeted for outreach and advertising of training opportunities include but are not limited to:

- Persons who do not speak English – i.e., Limited English Proficiency
- Persons with HIV/AIDS and HIV/AIDS service providers
- Homeless persons and homeless service providers
- Public housing residents and the Housing Authority
- Community Development Corporations and residents served
- Mental Health service agencies/organizations and clients
 - Alcohol and Drug Agencies/Organizations and clients
- Department of Health and Department of Human Services
- Civic organizations

- Faith-based organizations
- Persons with disabilities and service providers for persons with disabilities
- Economic Development/Job Creation Agencies and Community Businesses
- Private Housing Developers/Banks/Fair Housing Advocacy Groups/CRA Advocacy Groups
- Low- and moderate-income residents, particularly those living in areas where funds are proposed to be used or where access to information on programs provides a benefit to these residents.
- Residents of assisted housing, including recipients of tenant-based rental assistance

For the Workforce Development Program, VIDOL is tasked with developing and implementing a detailed outreach plan to ensure that outreach and communications efforts reach eligible survivors from all racial, ethnic, national origin, religious, familial status, the disabled, “special needs,” and gender groups and that they are given the opportunity to receive training and access employment opportunities created by the program.

Because the Workforce Development Program design prioritizes LMI participants and employees, it is critical that the outreach activities reach the LMI community. Outreach activities may include door-to-door canvassing and special efforts to communicate with hard to reach constituency groups.

Marketing will be conducted through widely available media outlets and tasks may include:

- Advertisement in local media outlets, including newspapers and broadcast media, that provide unique access for persons who are considered members of a protected class under the Fair Housing Act.
- Including flyers in partner government agency offices, community centers, and coordination with public and/or non-profit organizations and advocacy groups
- Use of social media when appropriate

Measures will be taken to make the trainings accessible to persons who are considered members of a protected class under the Fair Housing Act by holding whenever possible, classroom-based training in buildings that are compliant with the Americans with Disabilities Act (ADA), providing sign language assistance when requested, and providing special assistance for those who are visually impaired when requested. Translation services will be available for all community meetings as well as advisory services.

Program marketing materials and ads will be presented in English and Spanish and when relevant to a complimentary course or training, in French Creole, the prevailing languages in the Territory in accordance with Title VI of the Civil Rights Act of 1964, including persons with disabilities.

A Program Outreach Plan will include a methodology for evaluating the effectiveness of the outreach activities based on applications received. This evaluation will occur early in the launch phase of the Program to allow for resources to be shifted and focused in the most effective methodologies. Outreach and advertising efforts by VIDOL must document best efforts to meaningfully engage with the above at-risk constituency groups in the Territory. Documentation

such as relevant communication materials, email exchanges, ad content, or presentation materials will be kept for each course in the Project File.

Training providers may do their own outreach, recruiting, and advertising for their programs. Not all participants in the course will be low- and moderate-income, only participants being trained using CDBG-DR funding must meet that requirement. However, training providers are strongly encouraged to include the above groups as part of their own outreach strategy, documentation of which will also be included in the Project File.

7.1 Application Intake

DOL will receive and manage all applications. Applications must be submitted in accordance to the individual training provider's specifications, information on which will be maintained on both VIHFA's website, VIDOL's website, and in each agency's offices.

VIHFA: www.VIHFA.gov/disaster-recovery

VIDOL: www.vidol.gov

7.1.1 Intake Period

Applications will be accepted on a rolling basis and accepted candidates will be distributed into the most relevant cohort.

7.1.2 Geographic Target Areas

Applications and outreach will be accepted from both districts, St. Croix and St. John/St. Thomas. For verification purposes, the applicant's location is reviewed to confirm that they are within the service area. If travel assistance is required, it will be considered during the application process.

APPENDIX

- 1. Appendix A: Crosscutting Requirements and Process Overview**
- 2. Appendix B: Capacity Assessment and Initial Scope and Budget Form**
- 3. Appendix C: HUD Rider**

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