

Nebraska Disaster Recovery Employment Program (DREP) Operations Manual



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OVERVIEW

This manual provides guidance for operation and administration of the Disaster Recovery Employment Program (DREP) as authorized as part of a National Dislocated Worker Grant (NDWG) awarded to Nebraska Department of Labor (NDOL) by the United States Department of Labor (USDOL).

Purpose

The DREP was created to streamline and organize the uniform delivery of services provided by a Disaster Recovery NDWG. The DREP offers temporary employment to unemployed persons for the purpose of restoring public infrastructure and services so usual business and employment activities can resume.

Manual Intent

The intent of this manual is to provide frontline workforce staff with an in-depth overview of the DREP, including eligibility determination of participants, required case management actions, as well as the general application requirements and other required responsibilities.

Grant Request

Upon declaration of a major disaster announcing the availability of public assistance by the Federal Emergency Management Agency (FEMA), NDOL may apply for a Disaster Recovery NDWG to provide temporary employment through the DREP. NDOL has 15 calendar days after the declaration to collect the best information available and submit an emergency NDWG application. USDOL will approve or deny the grant application based upon regulations, project scope, and funding availability. The DREP can only operate in counties for which a disaster has been declared and Public Assistance funding has been granted.

The NDOL Employment and Training Division coordinates with the impacted counties to determine manpower and budgetary needs in the affected areas. The information is compiled and reviewed by the Employment and Training Director and Commissioner of Labor to establish the amount of the grant request. USDOL may or may not approve the fully requested amount. NDOL has 60 calendar days after the grant is awarded to further assess the regional needs and submit a full grant application with adjusted budgets, revised worksites, number of participants needed, and other information as necessary, or required by USDOL.

Upon Notice of Award, NDOL, Nebraska Department of Transportation (NDOT), Nebraska Emergency Management Agency (NEMA), FEMA, and other key partners may hold meetings with potential worksites (depending on the disaster) including cities, counties, state parks, city parks, and non-profit organizations, to develop a project implementation plan. Privately owned property will be excluded from this particular grant.

Local areas must submit an application summarizing the needs of each worksite to be served under the NDWG. Local areas will record all necessary information using the application/forms provided by the NDOL

Grant Administrator. Necessary information includes the equipment needs, the nature and location of projects to be completed, the number of participants needed, the projected timeframe for completion, and information regarding FEMA coordination. No local area will receive funds without first providing this information.

The local areas calculate the total need for labor, equipment, supplies, etc., for all projects and submit these amounts to the NDOL Grant Administrator using the DREP Application Packet. NDOL allocates funding based on project completion dates and regional needs. Since NDOL must request the grant prior to these meetings, the total funding needed will often exceed the grant award amount. NDOL can, when prudent, request additional funding from USDOL once the statewide grant expenditures reach 70%. This additional funding is not guaranteed and is contingent upon availability and project scope.

After funding is allocated, the local area(s) must prioritize the projects. The NDOL Grant Administrator will assist the local area(s) in making these determinations after analyzing the overall cost-per-participant and local economic impact.

County Opt-Out

FEMA approves public assistance in counties that have sustained a substantial amount of damage to public properties. If a county chooses not to participate, the local area will need to obtain an 'Opt Out' letter from the county stating either "the county does not need assistance as all clean-up has occurred" or "the county chooses not to accept assistance under this program". The local area must make every effort to ensure the county understands how valuable the program is in restoring the community; however, if the county will not provide an 'Opt-Out' letter, the local area should maintain relevant correspondence in their files.

Allowable Grant Activities

Disaster Recovery NDWGs provide funding for disaster relief employment, supportive services, and career and training services, depending on the need for the local area and what is requested in the grant application itself. WIOA allows for career and training services to be provided concurrently with the disaster relief clean-up however, the state must have met the expenditure threshold (70% of the prior program year's Dislocated Worker formula funds) in order to request career and training services for a Disaster Recovery NDWG. Nebraska has not met this threshold; therefore, career and training services are not available with this grant.

Disaster relief employment is the priority under all Disaster Recovery NDWG activities for the State of Nebraska and will be the only activity funded under the Disaster Recovery NDWG. Employment is limited to temporary positions, which are disaster related, and must be classified as either "debris" or "humanitarian", depending on the nature of the work performed. These positions are restricted to the specific activities, as defined by Training and Employment Guidance Letter (TEGL) 2-15.

Debris positions, which include labor or conduct oversight of work in the devastated area(s), may include operating equipment, driving worksite vehicles, cleaning out and repairing culverts, performing

rake/shovel/wheelbarrow work, repairing roads and levees, removing sandbags, restoring playgrounds and trails, and supervising crew.

Humanitarian positions, which provide direct aid to victims in the disaster, may include handing out food and water, managing emergency supplies, administering first aid, and other humanitarian assistance designed to alleviate suffering for disaster victims.

Adhering to DREP Policies

All policies outlined in this Manual must be adhered to by the local area(s) participating in the DREP even if local policies contradict certain portions. These policies were defined with local input and ensure the DREP is consistent statewide. The consistency will assist in USDOL, State and local monitoring processes.

PARTICIPANTS

Eligible Workers

To be eligible for placement into the DREP, participants must be unemployed and determined eligible using the guidelines defined in WIOA Sec. 170(d)(2) outlined below, according to the following order of priority:

1. Workers temporarily or permanently dislocated as a result of the disaster;
2. Self-employed individuals unemployed or significantly underemployed as a result of the disaster;
3. Dislocated Workers as defined by WIOA Section 3(15); or,
4. Long-term unemployed defined by the State of Nebraska as having received 13 consecutive or more weeks of Unemployment Insurance (UI) or having exhausted UI benefits.

Initial Nebraska Career Center Process

Staff should identify potential eligible workers through the delivery of normal services such as staff-assisted job searches, scheduled UI-related appointments, WIOA orientation and WIOA scheduled appointments. Staff and local areas are also encouraged to promote these opportunities in their local areas and with local partners. It is imperative that Nebraska Career Center staff be made aware when an area employer is in need of temporary workers for the DREP as well.

The DREP is designed to provide immediate recovery through a jobs-first approach. To gather information quickly before completing any potentially unnecessary eligibility data entry, potential participants can be screened for possible program eligibility using the optional DREP Jobs Interest form.

Potential participants will go through the Nebraska Career Center process to be screened for eligibility into the DREP. The following steps should be completed as part of this process.

1. An interested individual must meet with a Nebraska Career Center staff or WIOA service provider staff. It is preferred that a WIOA staff be the first person of contact, however, if a WIOA staff is not available, a Wagner Peyser job seeker staff will assist the individual. A supervisor or regional manager should

assist if no other staff are available.




2. The Participant creates or updates his/her *NEworks* system profile, to include the General Information and Background sections.
3. The Participant must have an active Wagner-Peyser (W-P) enrollment before the next two steps can be completed.


Title III - Wagner-Peyser (WP)

Apps: 1

[Create Title III - Wagner-Peyser \(WP\) Application](#)

WP #986285 - Complete





LWDB:	07 - Region 7	Application Date	06/06/2018
Onestop:	20 - American Job Center - Omaha	Participation Date:	09/05/2018
Total Activities:	215	Closure Date:	N/A
		Exit Date:	N/A

As a reminder, a WP enrollment will be evident by having an application that reads ‘Complete’ and has a participation date recorded. Please contact your supervisor if you have questions on accessing and/or completing the Wagner Peyser application.

4. The Participant must be matched and referred to a DREP job order. If the participant is later hired at a DREP worksite, the participant’s status on that job order is to be updated to ‘Hired’ by the assigned staff. If the individual does not match to a DREP job order, regular Nebraska Career Center services should continue to be provided.
5. Staff will enter eligibility information into the *NEworks* system using the ‘Create WIOA Application’ function. To access NDWG eligibility, staff must check Dislocated Worker as the program for determining eligibility. Please contact your supervisor if you have questions on how to access the WIOA Application.

Title I - Workforce Development (WIOA)

Apps: 0

[Create Title I - Workforce Development \(WIOA\) Application](#)

[Convert WIOA Pre-Application](#)

A worksite may or may not be involved in the participant selection process for the open DREP positions. Depending on the number of potential DREP workers needed and the worksite’s capacity, there may not be time for traditional interviews. Some worksites may just ask for a certain number of workers and the Career Center will make appropriate matches.

Job Descriptions/Job Orders

All DREP temporary positions will be entered as job orders in *NEworks*. These job orders will be posted internally and not available online to job seekers. This is done to prevent confusion or frustration, since grant eligibility is required for the positions. When entering the job order into the labor exchange system, staff must indicate that the job order information will not be displayed online to job seekers. Local area business services staff will assist employers with entering in job orders associated with DREP.

Job Order Information to be Displayed Online

Display online to job seekers:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Display your company name:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Display worksite full address:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Display worksite street address:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Have a local workforce staff member screen your applicants:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Require the applicant to meet the staff member that is screening:	<input type="radio"/> Yes <input checked="" type="radio"/> No



Job Order Information to be Displayed Online



Display online to job seekers: ☐ Yes ☒ No

Please note that this job will not be displayed in job search results. Job seekers will NOT be able to apply directly online to this job. Only staff will be able to view the job and make referrals. To allow job seekers to view and/or apply online for this job, please click the Yes radio button above.



Job descriptions must reflect disaster-related work to be completed at the worksite and not “regular” worksite duties. If job descriptions are used from the worksite, the information must be modified to reflect the actual disaster-related duties only.

The rate of pay must be matched with like-employees at the worksite. If the position does not exist at the worksite, local Labor Market Information (LMI) data must be used to determine the wage.

All DREP participants must be referred to a DREP job order and given a job description prior to starting the temporary job assignment. The job order referral should only be issued to a participant who is qualified to do the work, especially if there are required licenses or skills needed for the position, such as a Class A CDL, or 6 months of experience with equipment operator.

The easiest way to refer a candidate to a position is to:

- 1) Assist the employer record where the job order is posted,
- 2) Select the check box and ‘Refer’ with the associated job order,
- 3) Select ‘Search Candidates’ and input the person’s information as they should be registered in *NEworks* and have a resume on file,
- 4) Select the check box and ‘Refer’ with the associated candidate,
- 5) Complete the remaining information, ensuring to select Referral with notification to Job Seeker Only,
- 6) Click ‘Save.’

	HR Learning and Development Specialist	Open and available	on-line	Open and available	6/3/2019	7/31/2019	28	6	Copy Edit Delete Search by Job Criteria Pre-fill Advanced Resume Search Applicants Preview Template	
										Refer Map Export

Page 1 of 1 Rows 50

Refer Candidate(s) with or without Résumé(s)

If you would like to refer candidates who might or might not have online résumés in the system, click the *Search Candidates* button in this section.

[Search Candidates](#)


[\[Return to previous page \]](#)

[Return to My Dashboard](#)

 For help click the information icon.

Results View: [Summary](#) | [Detailed](#)

To sort on any column, click a column title.

User Name	First Name	Last Name	SSN	Vet	State ID	Last Login Date	Last Exited	Created	Program	Referred	Action	Select
						10/23/2018		06/13/2016		No	View Follow Up Assist Individual Summary Tab Case Notes Tab Activities Tab Programs Tab	
												Refer

SEARCH CRITERIA:




Referral Type




* Please make a selection below on how to notify the users involved in this referral.

- ☐ Notification To Employer Only
 ☐ Referral only with no notification
☐ Notification To Job Seeker Only
 ☐ Referral with notification To Employer Only
☐ Notification To Both
 ☐ Referral with notification To Job Seeker Only
☐ Referral with notification To Both

The easiest way to update the job order referral status is to:


- 7) Assist the employer record where the job order is posted,
- 8) Click 'Applicants',
- 9) Select the check box next to the 'Applicant' name of which you are wanting to change the status of,
- 10) Select 'Status' for that Applicant,
- 11) Select 'Hired' when the applicant is hired and input the following information:
 - Start date
 - Salary
 - Salary Type
- 12) Click 'Save Status'.


	Production Worker Blowmolding (A Shift) 6:45am - 6:45pm	Open and available	on-line	Open and available	7/9/2019	8/8/2019	4	3	Copy Edit Delete Search by Job Criteria Pre-fill Advanced Resume Search Applicants  Preview Template	
--	---	------------------------------------	---------	--------------------	----------	----------	---	---	--	---



	of Omaha, NE	6331	10th Grade Completed	ANY	Not Specified	Not Rated	0%	75%	Yes	Details Resumé How Do they Measure Up	
United States										Contact Rate Status  Print Map Résumés Export	


Applicant's Recruitment Stage

Below are various recruiting stages. Please indicate the stages, if any, that the applicant DAILYN PENT has completed. Choices in this section will determine the Applicant's Current Status in the Applicant Summary section below and may generate additional prompts for your input.

Scheduled Interview: ☒ Not Specified ☐ Yes ☐ No 
[Today](#)

Interviewed: ☒ Not Specified ☐ Yes ☐ No 
[Today](#)

Hired: ☒ Not Specified ☐ Yes ☐ No  
[Today](#)

Notified of Non Hire: ☒ Not Specified ☐ Yes ☐ No 
[Today](#)

DREP Eligibility Documentation Requirements

All DREP participants are to have the mandatory Initial Service Case Note at time of enrollment. The Initial Service Case Note must include information regarding the (1) summary of eligibility, (2) the position the participant was referred to, (3) the plan of activities to be offered, (4) how the plan will be implemented, and (5) the evaluation of services.

Example of a mandatory Initial Service Case Note for the DREP:

“Participant came into the Nebraska Career Center to be enrolled into the DREP program. After reviewing all documentation, it has been determined that the participant is eligible to participate in the NDWG as a dislocated worker. Participant has been referred to the Equipment Operator position at the Johnson County worksite, job order #12039393. Participant has been sent on this date to complete necessary pre-employment screenings, which include a background check, drug testing, a physical, and a tetanus shot. Upon successful completion of all pre-employment screenings, participant will begin DREP employment and complete required safety training. Evaluations will be completed every 90 days to track progress during the temporary employment.”

Although this example has been provided, please note that each case note should reflect information as it relates to the individual participant and grant activities.

Also, note that this case note states this participant is eligible and has been referred to a position; enrollment does not begin until the first day of employment; see the “Enrolling into the DREP” section for further details.

Documentation for enrollment into the DREP is as follows:

1. Individual Dislocated as a Result of the Disaster

An individual who is dislocated because their employer was adversely affected by the disaster is eligible for the DREP under Category 12 in the *NEworks* system.

To determine eligibility, staff must verify the dislocation occurred as a result of the disaster.

A Disaster Unemployment Assistance (DUA) claim is the most reliable documentation of dislocation due to the major disaster. If documentation of a DUA claim is obtained, no other documentation of layoff or dislocation is required. If there is no DUA, but there is a regular UI claim, staff must collect the Self Attestation form from the individual attesting to the fact that the layoff was due to the disaster. This is also considered reliable documentation and no other documentation of layoff or dislocation is required. NDOL Supervisors and Regional Managers can make this determination by accessing BPS.

If there is no eligible UI claim, staff must secure documentation to support the claim that the applicant was employed at the time of the disaster and that the dislocation occurred as a direct result of the disaster. Ideally, this would be in the form of paystubs or other payroll records, a bank statement indicating direct deposit from the most recent employer, and/or a letter from the most recent employer. A case note documenting phone verification of employment and dislocation event would also be acceptable. Any of these records must be accompanied by the signed self-attestation from the individual attesting to the fact that the dislocation event was due to the disaster.

It is possible that an individual may not be able to provide all eligibility documentation as a result of the disaster (i.e. documents were lost or destroyed in tornado/flood, etc). In these cases, the “Self-Attestation” form can be accepted to attest that the documentation is not available at time of eligibility determination initially. However, the participant must provide full eligibility documentation within 60 days of the enrollment date.

Use the following timeline to secure eligibility documentation:

- 1) If the individual is hired at a worksite, s/he must provide proper identification and/or documentation **within 30 days**.
- 2) If documentation cannot be provided at that time, and good cause can be shown for failure to meet the 30-day deadline, the participant may be granted an **additional 20 days** to provide adequate identification.
- 3) In extenuating circumstances only, the participant may be granted an **additional 10 days**.
- 4) If such documentation is not provided within **60 days**, the participant will be terminated from the DREP, and no further NDWG-funded services are allowed.

Such cases should be supported through case notes.

2. Self Employed Individuals Unemployed/Underemployed as a Result of the Disaster

A self-employed individual who is now unemployed as a result of the applicable disaster is eligible for the DREP as a dislocated worker under category 5 in the *NEworks* system and should be enrolled as such.

A self-employed individual who is significantly underemployed as a result of the disaster is not eligible as a Dislocated Worker but is still eligible to participate in the DREP under Category 12.

Self-Employed individuals who are significantly underemployed as a result of the disaster cannot be enrolled into the *NEworks* system at this time, because the employment status disables an additional required field under the ‘Dislocated Worker Grant Eligibility’ section. Until this issue is addressed, it is highly discouraged that this eligibility category be utilized.

At least two items must be documented to verify eligibility under either subcategory. Adequate documentation must clearly show that the individual (1) was self-employed and (2) is now unemployed or underemployed:

- Evidence of self-employment may be provided through a business tax return, or a business license, or any other legal document which shows self-employment and which could be verified by phone.
- Evidence of unemployment/underemployment due to the recent disaster is to be provided through self-attestation and a copy of the Disaster Declaration showing that the business’s address or service area is located within a county on the applicable FEMA declaration.

3. Dislocated Worker as Defined by WIOA:

Individuals who meet the definition of a dislocated worker (DW) as defined in WIOA Sec 3(15) are eligible to participate in the DREP and must have their eligibility fully documented in either an electronic or hard copy file. Through the WIOA application function, staff must select the appropriate category for which the individual meets eligibility. Staff are required to co-enroll DW eligible DREP participants into the DW program.

4. Long-Term Unemployed

For the purpose of the DREP, long-term unemployed is defined as any individual who is unemployed at the time of eligibility determination and has been unemployed for 13 or more consecutive weeks or have exhausted UI benefits. This is verified via BPS and viewing the number of weeks of UI claims. BPS can only be accessed by NDOL Regional Managers and Supervisors. If this information cannot be obtained at time of eligibility determination, a self-attestation form should be completed.

Eligibility & Grants Tab (WIOA Application)

On the last section/tab of the WIOA Application, labeled the 'Eligibility and Grants' tab, staff must record that the DREP participant meets NDWG eligibility and which grant the participant will be participating in.

First, record eligibility for the National Dislocated Worker Grant:

National Dislocated Worker Grant NDWG: ☒ Yes ☐ No ☐ Not Applicable

Second, record the grant by adding the correct grant to the record.

Grants

Grant Type	Grant ID	Grant Name	Local Grant Code	Date Added
National DW Grant (NDWG)	11	DREP - March Storms	Not Defined	07/26/2019

To confirm that the grant code was added, verify that a date is displayed under the 'Date Added' column.

Grant Type	Grant ID	Grant Name	Local Grant Code	Date Added
National DW Grant (NDWG)	42	MO42-Spring 2017 Storms and Flooding	MO42	04/13/2018

Pre-Employment Screenings

Each DREP participant must pass necessary pre-employment screenings, which are used to determine if the participant is suitable for work in the DREP. These screenings must be completed after an eligibility determination has been made and before employment can begin. These pre-employment screenings are dependent on the Worksite and/or the position classification. A Worksite may require a background check or drug test only if they are also required of the Worksite's regular employees in similar positions.

Pre-employment screenings must be performed in order.

- 1) Background checks - if required of regular employees at the Worksite.
- 2) Drug testing - if required of regular employees at the Worksite.
- 3) Physical - required for all *debris* positions prior to beginning work.
- 4) Tetanus shot - required for all *debris* positions prior to beginning work.

If a participant fails a pre-employment step, s/he may be placed elsewhere. For example, if s/he fails the background check but another position that does not require the background check is available, the participant may go to the next pre-employment step. However, if another position is not available, s/he

cannot be enrolled into the DREP and should be referred to the Nebraska Career Center for services.

All costs prior to employment being obtained are considered 'Project Operating' costs by USDOL and are categorized as 'Pre-Employment' costs on the local and state budgets.

Each cost -- background checks, drug testing, physicals, tetanus shots, and costs for the participant to attend pre-employment activities (i.e. transportation reimbursement) -- must be case noted. Case notes must include (1) the date the participant was sent to the pre-employment screening and (2) the date s/he completed the activity. Pre-employment costs are not considered as a supportive service or any other type of service.

Participant Orientation

Prior to obtaining DREP employment, individuals must complete an orientation into the program. At the time of this orientation, the participant should sign the Participant Orientation form. The signed original should be kept in the participant file and a copy given to the participant for his/her records.

The participant orientation must address the temporary nature of DREP positions (12 months or less) and that participants are expected to continue to seek other employment while working in the DREP position. Participant orientation should also review the DREP Media Consent form, the DREP Emergency Contact form, and the DREP Medical Disclaimer form.

Assessment and Employment Plan

USDOL Training and Employment Guidance Letter 2-15 outlines the allowable activities for Disaster Recovery NDWGs. During the disaster relief employment portion of a NDWG, services such as assessments and employment plans are not required, as these services fall under career services.

If a participant is co-enrolled in a funding source that provides and allows for career services, such as the Dislocated Worker program, these services may be performed but must be tied to the correct customer group.

Enrolling into the DREP

A participant cannot be enrolled into the DREP until s/he has passed all required pre-employment steps and begins employment. Enrollment must occur within 30 days of completing the eligibility/application form.

- For *humanitarian* positions, employment is the first day on the worksite.
- For *debris* positions, safety training is considered the first day of employment.

The day the participant starts temporary employment, staff must complete the Participant Orientation Form and record a DREP applicable service as the first service/activity, creating the enrollment in the *NEworks* system. If the Participant Orientation Form has already been completed, record all DREP services as usual. All DREP services must be tied to the NDWG customer program group and the correct grant.

Below are the minimum services to record at time of enrollment; specific code numbers to come soon.

- ### – DREP Employment
- ### – DREP Safety Course – required for debris positions only
- ### – DREP Supportive Services – required if/when supportive services were received

Safety Training

Safety training is required for all debris positions prior to working on the actual worksite. Safety training marks the participant's first day of employment. A certificate or proof of completion, which must be kept in the participant's file, is required before the participant can begin work on the worksite. If a participant is not able to complete the safety training, enrollment in DREP must be ended and other Nebraska Career Center services should be provided.

Safety Training must be documented in case notes and the ###-DREP Safety Course code (specific code number coming soon), tied to the correct grant, must be recorded to the WIOA application.

Activity / Provider	WZ	Funding / Grant	Projected Begin Date	Actual Begin Date	Projected End Date	Actual End Date
		National Dislocated Worker Grant (NDWG)	N/A	10/11/2017	10/11/2017	10/11/2017 Completed

If the local area hired supervisors to assist with planning prior to field work, safety training may be postponed until the larger group is ready to begin field work. If this occurs, case notes must indicate the reason that safety training has not occurred.

Length of Time for DREP Positions

All DREP positions have a maximum of 2,080 hours or 12 months of employment, whichever occurs first. This does not mean that the participant will work the maximum duration. The duration of the employment is to be based off the worksites' individual needs, which could mean a shorter duration. All DREP positions also have a maximum cost per participant that the local areas will discuss with the NDOL Grant Administrator following application submission.

Participants will work no less than a "normal week," generally 40 hours, unless there are unforeseen circumstances (i.e. weather) that prohibit working a specific day. Part-time positions are acceptable only if needed by the worksite. Participants may work overtime provided that regular employees of the worksite are also working overtime.

Local areas must track each DREP participant's employment, to ensure the 12-month duration, 2,080-hour cap or cost per participant cap is not exceeded. Each participant should get as close to the maximum duration as possible, if these hours are available at the worksite. Local areas may find it necessary to establish an earlier cutoff to ensure that the maximum duration and cost per participant cap is not exceeded. If a participant exceeds the maximum duration or cost per participant cap due to internal tracking processes, the local area is responsible for paying the additional hours and required to establish a process to prevent future occurrences.

If a participant misses work for an extended period of time the Worksite and the DREP staff should determine (1) the reason for the absence, (2) if supportive services are needed to participate in the DREP, and (3) if employment needs to be terminated.

No participant will be allowed to continue temporary employment if s/he is not actively engaged and working on a regular basis. If a participant has not received a service funded by the DREP for 90 consecutive calendar days, enrollment in the DREP must be closed. If a participant cannot continue temporary employment due to a hard exit reason (Institutionalized, Health/Medical, Deceased, Reservist called to Active Duty, Retirement, In Foster Care and moved from area by foster care system), the local area must Create Exit/Outcome in the *NEworks* system to have the enrollment ended with the appropriate outcome. The individual will then be removed from performance reporting measures.

Wages and/or Promotions

Participants in DREP will be paid the same wages as employees in like positions at the worksite, commensurate with experience and skills. Raises extended to regular employees must also be extended to DREP participants working within the same job class.

If a worksite supervisor position comes open during the DREP, a fair and competitive process must be in place to ensure all DREP participants have the same opportunity for consideration. The process and decision should be provided in a case note along with the participant's worksite performance information.

The local area is responsible for ensuring wages and promotions are fair and equitable.

Transportation

Transportation from a central location to and from the worksite may be necessary due to safety and parking issues. Any other transportation needed by participants must meet the criteria of Supportive Services. Supportive Services are discussed in depth in the 'Supportive Services' section of this Manual.

Worksite Orientation & Policies

The Worksite must give the participant an orientation on worksite policies just as the Worksite would do for any other employee. At a minimum, the worksite orientation must include the elements listed on the DREP Worksite Orientation form. In addition, any training, beyond the safety training, required by the Worksite must be provided. If the DREP participant is unable to successfully complete any worksite training requirements or adhere to worksite rules, s/he is terminated from the DREP and referred to the Nebraska Career Center for services; a case note must also be entered onto the participant's record in these cases.

If the Worksite does not have policies to address certain situations (i.e. sexual harassment or drug-free workplace), participants must follow the Employer of Record's policies. All Employers of Record under the NDWG must have policies in place to address these situations.

The local area is responsible for ensuring worksite orientation and policies are maintained.

Evaluations

An evaluation must be completed on each DREP participant every 90 days during the temporary employment phase of the NDWG. The Worksite must provide information on the participant's performance, both positive and negative, in order to track progress and promotion possibilities. Use the DREP Participant Evaluation form to document performance and enter performance into case notes. The local area is responsible for all evaluations.

Reenrolling

Typically, DREP participants who are terminated from the program are not allowed to be reenrolled in the same NDWG, exceptions being cases where someone could not supply eligibility documentation within the 60-day timeline, for example. It may be acceptable to reenroll participants who were successful in the program and obtained other employment or had a temporary break due to medical reasons; however, s/he must have provided appropriate notification. Previous participants should not be reenrolled unless there are no other participants to fill the positions. In all cases of reenrolling into the same NDWG, a participant cannot exceed the 12-months, 2,080 hours or cost per participant cap allowed for temporary employment.

DREP participants may enter into a different NDWG after successful completion in the current NDWG, given the participant meets eligibility guidelines. However, this should be a case-by-case decision based on the need of the worksite and if no other participants are available to fill the position. If the participant is enrolled into another NDWG, a case note must explain the situation and show that other participants were not available. In these cases, the participant entering temporary employment under a new NDWG will start back at zero hours.

Recording Grant Outcomes

When a participant completes all grant activities, all services should be closed with appropriate outcomes.

The ###-DREP Employment activity (specific code number coming soon) should be closed with one of the following:

- Successful Completion
- Did Not Complete

OJT service-related outcomes are not to be used when recording the closure.

After all DREP services have been closed, staff must record a Grant Outcome. The Grant Outcome will record basic closure information to include completion information and employment at completion information.

To record the Grant Outcome, click the 'Create Grant Outcome', found under the Grant Outcome bar of the WIOA Application.

☐ **Grant Outcome**

[Create Grant Outcome](#)

All fields must be completed, as well as any supporting employment information. To add supporting employment information, click Add/Edit Entered Employment.

Grant Outcome Information

*** Grant:**

Grant Outcome Date: 02/05/2018

*** Employed at Grant Outcome:**

Add/Edit Entered Employment

*** Grant Outcome:**

SUPPORTIVE SERVICES

Under Disaster Recovery NDWGs, supportive services are allowable for participants to participate in disaster relief employment. Supportive Services are those services necessary to enable an individual to participate in activities authorized under the NDWG and should be made available to assist customers in removing or reducing barriers to participate in the grant's activities. While participating in the DREP, a participant has a limit of \$1,000 of supportive service funding available.

Supportive Services may include transportation, dependent care, needs-related payments and financial assistance. Assistive technology/equipment may be included if staff document the participant's need for this technology/equipment in order to participate in the grant activity and if unable to obtain it from other resources. The extent of Supportive Services provided will vary based on the participant's need and the local area's availability of funds and resources.

Supportive Services are only to be provided to DREP participants who meet all of the following:

- Are in a temporary job assignment or have successfully completed the temporary job assignment and are receiving other services through the grant;
- Are unable to obtain Supportive Services themselves or via their support network;
- Are unable to obtain Supportive Services through other programs including community agencies that provide these services; and
- Demonstrate a need for assistance to enable participation in the grant's activities.

Supportive Service payments are authorized based on available funding and are limited to \$1,000 per participant. If a DREP participant's need is above the maximum limit, an additional amount must be approved by NDOL. Requests are first reviewed by the local area to verify justification and then emailed to the NDOL Grant Administrator for approval.

No Supportive Service can be authorized until the participant has obtained DREP employment and is enrolled into grant activities. Each Supportive Service payment must be documented in the *NEworks* system along with a case note that includes the type of supportive service, justification, reason, date, and amount of the payment. Add ### – DREP Supportive Services (specific activity code coming soon) to the participant's record when a DREP Supportive Service is received.

Needs-Based Analysis

Because the DREP is not an entitlement, Supportive Service payments are made on a case-by-case basis only when they have been determined necessary and reasonable. Payments must not be made for non-grant activities or for items that are not necessary for participation in the grant activity. A statement alone that states a participant "needs" a supportive service will not justify the payment of these expenses.

Due to funding limitations, supportive services are the last resort. All other sources of funding must be sought first. All attempts to find other supportive service funding and the reasons for needing DREP funding must be documented in case notes. Each local area should keep an up-to-date listing of other resources to make referrals to prior to paying supportive services.

Possible community resources include faith-based organizations, non-profit organizations, women's shelters, clothing closets, pro bono medical, dental, and legal services, government assistance such as local health departments, WIC, assistive technology reimbursement programs, local transportation programs, and statewide and nationwide organizations such as: United Way, Goodwill, and Salvation Army.

When the workforce being assisted is concentrated in one area and a community organization will be contacted multiple times, the local area should obtain a statement once a quarter that the organization is unable to provide the requested assistance.

Transportation

Transportation reimbursement is allowable for DREP participants after a needs-based analysis and justification is completed. A local area can follow its own supportive services policy regarding transportation reimbursement; however, the reimbursement rate cannot exceed \$0.58 per mile.

Mileage from the participant's home address to the grant activity is determined using Map Quest or another standardized program. In the participant's file, document the initial determination and the ongoing need for transportation reimbursement.

As a reminder, transportation reimbursement to attend pre-employment activities is considered a Project Operating cost, and not a Supportive Service, however, all criteria must still be met and must be documented in case notes.

Standard local area reimbursement policies and procedures are to be followed; the NDOL Grant Administrator must be included in all communication regarding expense reimbursements.

Dependent Care

Childcare payments are permissible for DREP participants after needs-based analysis and justification is completed.

This Supportive Service is only available for participants **not eligible for assistance** through the Department of Health and Human Services (DHHS); the DREP participant must provide documentation that DHS would not pay childcare expenses. Childcare must be provided from a State Approved Day Care.

If DHHS requires a co-payment, Supportive Services may be used. Child care referrals and payments are available to DREP participants with children under thirteen (13) years of age, children incapable of self-care, and/or children under court order who need care while participant is attending his/her authorized DREP activity. Verification of emotional, mental, or physical incapacity or court order must be provided if the child is older than 13. These documents must be kept in a separate and secure location. Payment for child care is based on the rates provided by DHHS Child Care Subsidy; to apply call 800-383-4278.

Standard local area reimbursement policies and procedures are to be followed; the NDOL Grant Administrator must be included in all communication regarding expense reimbursement.

Financial Assistance

The purpose of a Financial Assistance payment is to make a payment to a service provider or vendor on behalf of a participant. This payment is used to cover an emergency financial need that, if unmet, would prevent the participant from participating in the DREP.

Financial assistance may be used for such things as: housing assistance, auto repair, eyewear repair, and other critical participant needs. Financial assistance may not be used to pay any type of fines or penalties imposed because of failure to comply with any federal, state, local law or statute.

If the participant is having extreme financial difficulty, staff must be assisting him/her with needed financial information (development of a budget, credit counseling, debt management, etc.).

As with other Supportive Services funding, all other resources must be sought first. For example, heating and cooling assistance could be pursued through Low Income Home Energy Assistance Program (LIHEAP), local programs, and faith-based organizations.

Standard local area reimbursement policies and procedures are to be followed; the NDOL Grant Administrator must be included in all communication regarding expense reimbursement.

Expendable vs. Non-Expendable Clothing

Specific clothing required for debris-removal positions is considered expendable, or disposable, when the

clothing will be of no value after the work is completed. This expense does not count towards the participant's DREP Supportive Service \$1,000 limit. Because of the nature of expendable, or disposable, items, a needs-based analysis for the clothing is not required.

DREP Supportive Services for expendable items must adhere to the following guidelines:

- The ###-DREP Supportive Services (specific activity code number coming soon) service must be opened during the timeframe the participant received the item(s).
- Case note must include each item purchased, the cost, the date the participant received item(s), and a statement indicating the item purchased is an expendable item.
- If a voucher was used, the case note must indicate the amount of the voucher, the date the items would be purchased, and the items to be purchased. After invoiced, the cost per item must be recorded in case notes, referencing the previous case note.

Supportive Services Activity Code Features

NDOL's electronic case management system (i.e. *NEworks*) has features to enable the DREP Supportive Service activity code to cover a period of time of up to ninety days. When providing a same day service, the activity code should be closed accordingly. However, when providing long duration supportive services, such as transportation/mileage assistance, the ###-DREP Supportive Service (specific activity code number coming soon) activity code's projected end date can be extended out up to 90 days, as necessary.

Supportive Service Case Notes

All Supportive Services must be documented in the case notes sections of the *NEworks* system and include at a minimum:

- The *type* of Supportive Service paid (e.g., transportation, childcare, etc.),
- The *amount* of Supportive Service paid and total amount paid in Supportive Services to date,
- The *timeframe* the Supportive Service was paid for,
- The *justification* for the Supportive Service (not required for expendable items), and
- Verification of the lack of other *communityresources*.

In all cases, staff must review case notes prior to making any Supportive Service payments to avoid duplicate payments.

Responsibilities

It is the responsibility of local area staff to provide accurate information to the customer including:

- If s/he is eligible for requested Supportive Services.
- If s/he is no longer eligible to receive the Supportive Service for any reason (i.e. cap met, no longer has a need).
- The requirements (e.g., paperwork, employment) to receive the Supportive Services.

Also, local area staff are required to maintain a digital file for each participant to include all required documentation in the data management system.

CASE MANAGEMENT SYSTEM REQUIREMENTS

Completing entries into the *NEworks* system accurately and in “real-time” is necessary for successful local, state, and federal monitoring reviews. In addition, the information contained in this database is essential for the participant’s success. Following are helpful reminders/tips regarding case management entries. Some apply only to the DREP, while others are overall program reminders.

- Real-time data entry must be completed.
- If a case note is not entered on time, “LATE” must be in the case note with the actual date referenced.
- All case notes for DREP are to be tied to the WIOA program.
- Case notes and the associated service dates must match.
- Case notes must indicate worksite observations or evaluations to ensure the participant is receiving regular contact and assistance from the career planner and the worksite supervisor.
- If a participant is enrolled in the NDWG and then determined ineligible due to lack of documentation, the enrollment should be closed as “Did Not Complete,” not as “Void.”
- When the participant is no longer receiving DREP services, all DREP services must be closed.
- Upon completion of grant activities a grant outcome must be recorded per participant.
- Same day services should be opened and closed on the same day it was provided.
- A ###-DREP Supportive Service (specific activity code number coming soon) cannot be added to the record until employment with a temporary disaster job has been obtained.
- Since safety training is the first day of employment for debris workers, any transportation provided to safety training is a supportive service and should be recorded as such.
- Transportation reimbursement cannot be provided for pre-employment screenings unless the need meets all the criteria for a supportive service. Because it’s considered under the project operating costs, like pre-employment screenings, the ###-DREP Supportive Service (specific activity code coming soon) will not be added to a participant’s record. However, it must be documented in a case note, following guidelines for all other supportive services.
- ###-DREP Supportive Services (specific activity code number coming soon) should be left open only as appropriate. (i.e., a one-time payment for clothing would be open and closed the same day as provided; transportation reimbursement that spans a couple of weeks could be left open during that timeframe).

Case Management Checklist

A quick-reference checklist for what is required of all DREP participants is below:

- Completed *NEworks* registration, including updated General Information and Background sections.
- Wagner-Peyser enrollment.
- DREP Participant Orientation form.
- DREP Worksite Orientation form.
- Eligibility documentation.
- Completion of all hiring documentation.
- DREP Media Consent form.
- DREP Emergency Contact form.
- DREP Medical Disclaimer form.
- Proof of tetanus shot, physical exam, and safety course for potential debris workers.
- Proof of other worksite requirements as applicable (background check or drug screening).

- Case notes on each participant, including:
 - Date of tetanus shot, physical exam, drug testing, (if applicable) and background check (if applicable).
 - Note: Do not include medical information; only indicate that these requirements were met.
 - Any Supportive Service or transportation reimbursement payments received including transportation to safety training, clothing for debris workers, etc.
 - All payroll documentation, including total hours worked and totals hours worked to date.
- Referral to a DREP job order.
- Marked as ‘Hired’ to a DREP job order, if hired after completing pre-employment screening and other pre-employment DREP requirements.
- Accurate posting of all applicable DREP Services.
- Co-enrollment into the WIOA Title I Dislocated Worker program, if eligible.
- DREP Participant File Review form.
- Completed DREP Participant Evaluation form every 90 days.
- Completed DREP Checklist.

WORKSITES

Eligibility

Worksites are limited to public entities and private non-profit facilities located in the geographic area covered by the FEMA declaration issued for public assistance. Worksites can be cities, counties, road and bridge districts, levee districts, state and city parks, and non-profit organizations and the work must be related to the damage declared in the NDWG application. Each worksite must complete a DREP Worksite Agreement before workers can be placed at the site.

Each worksite must be documented on the Worksite Worksheet. The Worksite Worksheet and the Worksite Agreement(s) must be sent to the NDOL Grant Administrator before funds will be distributed to the local areas. The local area is responsible for this documentation and submitting to the NDOL Grant Administrator upon application submission.

Unions

A DREP Union Concurrence form must be signed before any worksite can be activated where labor unions are represented. The local area is responsible for this documentation and submitting it to the NDOL Grant Administrator upon application submission.

Worksite Closures

If a worksite is closed for the day due to inclement weather or other unforeseen circumstances, the worksite must follow the same protocol when notifying other employees. All participants who are affected by the closure must record the day on their Timesheet as “Worksite Closed.”

There are events that could cause a worksite to be closed permanently (1) the project has been completed

at the worksite, (2) the worksite is determined an invalid worksite and participants have been performing work beyond the guidelines of this grant and outside the worksite agreement, (3) project exceeds funds available, and (4) project closed, although not complete, due to damage from new disaster.

Disciplinary Action

Any required disciplinary action or termination of a DREP participant will follow the same rules and guidelines of the worksite, as these participants are to be treated as other employees. Termination of DREP participants by the worksite are reported to the “Employer of Record.”

All disciplinary action must be documented on the DREP Participant Evaluation form. A copy of the evaluation form is given to the local area. A copy is also kept in the participant’s file. If situations should occur where a DREP participant is terminated or receives disciplinary actions, the NDOL Grant Administrator must be apprised of the situation.

First Aid Kits

First Aid Kits are required on site, within reach of the participants and not stored in an office located away from the actual worksite. If a worksite does not have a transportable First Aid Kit, the local areas may provide such kits under this grant.

Supplies vs. Fitted Clothing

Supplies provided for DREP participants during debris cleanup and restoration are not considered Supportive Services and are not tracked per DREP participant. Instead, these supplies are tracked by overall quantity per worksite. Items that are fitted to the individual, such as boots, shirts, and pants, are considered Supportive Services and are tracked per individual and recorded in the *NEworks* system as described under the ‘Expendable vs. Non-Expendable’ section of this Manual.

Supplies, Equipment & Sensitive Items

The purpose of purchasing supplies and equipment is to complete the disaster project, and the majority of these items will have no useful life after the project ends. While supplies are generally not inventoried, the local area must maintain lists per worksite to ensure that only the necessary items are purchased for the participants to use in the program. These items should be kept in a secure location. It is the local area’s responsibility to have processes and procedures in place to verify all supplies and equipment are necessary and required for the participant to complete the temporary job assignment in disaster-related work.

Equipment is defined as the fair market value over \$5,000 per USDOL guidelines; however, local policies may define equipment as a different amount (i.e. \$1,000). When purchasing equipment, the rental versus purchasing cost must be documented and the need justified. All equipment purchases must be approved by NDOL and USDOL and requested in the same format as the “Heavy Equipment Request.” Treatment and disposal of equipment and supplies must comply with the Uniform Administrative Requirements as defined at 29 CFR, Part 95 or Part 97, as applicable.

Sensitive items – items generally for individual use or that could be easily sold, stolen, or misused and are

valued over \$250 – purchased by the grant must be returned to NDOL after completion of the project(s).

According to Uniform Guidance, in all cases, (1) the title to supplies will vest in the non-Federal entity upon acquisition. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other Federal award, the non-Federal entity must retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal Government for its share. The amount of compensation must be computed in the same manner as for equipment. (2) As long as the Federal Government retains an interest in the supplies, the non-Federal entity must not use supplies acquired under a Federal award to provide services to other organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute.

Contracts

All contracts entered into by the sub-recipient and subcontractors must include exit clauses and indemnifications to protect the local areas. In addition, all contracts should be through the grant timeframe or when the funding will be expended, whichever is first.

Accident Reports

In the event that a participant sustains injuries on the job, it is required that a claim report of the injury be filed. Accidents or injuries should be reported immediately to the Worksite Supervisor. The Worksite Supervisor must report the accident or injury to the local area DREP staff so necessary paperwork can be completed. Additionally, staff must also notify the Grant Administrator at NDOL.

Timesheets

The DREP Timesheet is used to record the days, number of hours worked, and the total amount of time spent on individual projects within each two-week period. The participant and supervisor must sign the timesheet in ink. It is the responsibility of both the participant and the supervisor to make sure the timesheet is submitted to the worksite office and submitted to the local area for submission to the NDOL Grant Administrator. In the event that a final timesheet is received with no participant signature, best efforts should be made to contact the participant for signature, documenting such attempts in the *NEworks* system. The final time sheet must be paid out by the next payroll period and requires the worksite supervisor's signature, at minimum.

If a worksite is closed for the day due to inclement weather or other unforeseen circumstances, participants who are affected by the closure must record the day on their Timesheet as "Worksite Closed."

Every paycheck must be documented through case notes in the *NEworks* system. Case notes must be entered the day the information is received. Documentation must include payroll period, number of hours, gross wages, and number of hours remaining in the DREP.

Worksite Supervisor Orientations

To ensure the DREP guidelines are followed, DREP staff must provide the worksite supervisor(s) with a worksite orientation delivered in the most efficient manner possible, which may include going to the worksite. At minimum, the information outlined in the DREP Worksite Supervisor Orientation must be covered. The worksite supervisor

signature is required, and the completed form is maintained in the worksite file. If the worksite supervisor is a DREP participant, a copy of this form must also be kept in the participant's file.

EMPLOYER OF RECORD

The "Employer of Record" rests with the entity paying the participant wages. Employers of Record for temporary workers are limited to public entities, not-for-profit organizations, and private for-profit entities, such as a staffing agency.

All participants must complete and provide documentation for the I-9 and W-4. The Employer of Record must retain all of these forms. Do not upload these forms into the *NEworks* system.

Fringe Benefits

At minimum, each participant in DREP will be covered by Workers' Compensation in accordance with State law through the program funding. All participants shall be provided fringe benefits according to the Employer of Record's temporary employee policy.

Unemployment Insurance (UI)

For UI tax purposes, Nebraska governmental entities that facilitate programs that are assisted or financed in whole or in part by federal, State, or local governmental agency are not required to report the wages of authorized participants in work-relief or work-training programs. As such, participants in Disaster National Dislocated Worker grants will not be covered by unemployment insurance compensation.

USDOL REQUESTS

The NDOL Grant Administrator sends heavy equipment and other requests to USDOL for approval per regulatory guidelines. The forms created for the requests must be used at the local level, as this is the process for submissions that has been approved by USDOL.

Heavy Equipment and Transportation

FEMA has extensive experience in obtaining and/or leasing heavy equipment in the aftermath of disasters, and provides such equipment for a limited period of time to permit clean up, reconstruction, and other allowable activities following a disaster. State and local governments may also lease or obtain heavy equipment for worksites where disaster grant participants are employed. Generally, disaster grant funds will not be authorized for the purchase or lease of heavy equipment for disaster relief work.

In certain situations, the worksite may not have and cannot afford heavy equipment to complete certain work. In these cases, NDWG funds may be used to lease necessary equipment for worksites where DREP participants are employed to support clean up and recovery activities. Such a need requires a heavy equipment request and must be sent to the NDOL Grant Administrator for review. The Heavy Equipment request form, which is available from the NDOL Grant Administrator, must be completed outlining the

equipment needs per worksite.

DREP Heavy Equipment Form must include justification of the equipment:

- Why the equipment is needed to perform/complete Disaster Grant projects.
- Verification that the worksite cannot pay for the equipment, even with FEMA reimbursement and that equipment reimbursement was not requested through FEMA.
- Verification that no other federal, state, or local agency is able to obtain the equipment.

The “Heavy Equipment” request form must include the local procurement process and the totals provided must match the “Budget” form provided to NDOL. The NDOL Grant Administrator must approve modifications to this request.

The request must also include the worksite, the work that will be completed by the project, the item needed, the item cost with estimated fuel and maintenance, and documentation that the local area has adequate insurance coverage for equipment purchased or leased.

Equipment should be leased from a company that can make quick repairs so progress and employment are minimally impacted.

Equipment (defined locally or when there is not a local policy, defined as over \$5,000) can be purchased using NDWG funds; however, this is a rare exception and must be approved by USDOL prior to purchase.

Many worksites will also require transportation from a central location or the need for leased vehicles to haul equipment. This is allowable for specific reasons like limited parking and hauling equipment. Due to the immediate need, local areas can procure transportation prior to approval, but must include it on the Heavy Equipment request.

Local areas have listed other items for purchases not defined as equipment on the heavy equipment request form (i.e. portable toilets, purchases not defined as equipment, etc.). If these items were previously listed, they must remain on the form. Any “new” requests should not include these items.

Local areas must send the NDOL Grant Administrator a list of all equipment leased or purchased with DREP funds. This list should include the type of equipment, whether it was leased or purchased, the planned cost and the final cost. This information is to be submitted using the DREP Heavy Equipment form. This information will provide historical data for analyzing how much money will be potentially needed in future disaster grant projects.

FEMA COORDINATION

Meetings

Per NDWG requirements, FEMA coordination is required to ensure non-duplication of efforts. If possible, local areas should be at the initial FEMA kick-off meetings after public assistance is declared. In addition, FEMA must be invited to the DREP meetings when determining worksites to ensure projects have the best

possible outcomes. If a local area needs a local FEMA contact, the NDOL Grant Administrator can be contacted or the local area can contact Theresa Weldon who is the Public Assistance Branch Director for DR-4420 NE (Theresa.weldon@fema.dhs.gov). If FEMA coordination has not occurred prior to the DREP project determinations, FEMA must be sent the Project Scope to ensure there has not been payment for the DREP requested items (i.e. labor).

Expenses

DREP expenses are generally paid directly by the local or its subcontractor, which means the Worksite will not have an invoice to submit to FEMA for reimbursement.

Wages are paid by the Employer of Record directly to the participant.

Heavy Equipment costs are paid directly to the vendor and the heavy equipment listings are sent to FEMA who then distributes the lists to local FEMA representatives. Due to the immediate need of fuel, some local areas are reimbursing the Worksite for this expense. NDWG funds cannot pay the FEMA match, only the exact cost due to reimburse the invoice.

In all instances, any expenses incurred that are reimbursed to the Worksite must be coordinated with FEMA. Local areas should avoid the practice of having the Worksite procure items and request reimbursement. Protocol has been established to reimburse the Worksite in the event that this occurs.

- The Worksite must release the original invoices to the local area upon payment.
- A tracking system must be in place to verify the expenses were DREP-related.
- The Worksite must sign a statement that the expenses are DREP-related and will not be reimbursed by FEMA.
- The local FEMA representative must be contacted to determine if the entity needs copies of the receipts/invoices.

FISH AND WILDLIFE SERVICE (FWS)

In order to ensure compliance with the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA) and to protect valuable habitats and endangered species, all disaster projects in which participants will be entering or impacting natural areas must ensure that activities are not negatively affecting endangered species or their habitats.

NEPA and ESA require NDWG projects to either affirm to FWS that there are no endangered species or habitats within the project area, or to consult with FWS to mitigate negative impacts where there are endangered species or protected habitats before beginning any work in those areas. For more information, contact a local FWS field office (www.fws.gov/offices/).

MONITORING & OVERSIGHT

Local Areas

Monitoring must be conducted by the local area to ensure that the participants, worksites, and related activities are consistent with the provisions of applicable Federal statutes, regulations, and the terms and conditions of the grant award letter.

The monitoring must include a review of all local area responsibilities listed above. In addition, the on-site monitoring process must include questionnaires and procedures for interviewing participants, the employer of record, the worksite supervisors, and must include on-site visits to worksites. Each review must verify that every worksite is conducting disaster-related work only. The Worksite On-Site Monitoring-Debris and Worksite On-Site Monitoring-Humanitarian forms must be used to conduct monitoring and should be retained locally, not sent to NDOL. Worksite monitoring must begin within two weeks of the first participant beginning employment and conducted monthly thereafter.

After each review cycle where all worksites have been monitored, a report must be compiled and maintained locally. This report must include reviewer(s), date(s) of visit, listing of counties and worksites monitored, projects monitored and number of participants at each site, verification all worksite agreements are in place and understood by the worksite, verification all work is disaster-related only, success stories and program progress, items found not in compliance, necessary corrective action, and necessary follow-up.

If any items are not in compliance at the worksite, the local area must forward this report to the NDOL Grant Administrator.

It is imperative the local areas maintain regular contact with the NDOL Grant Administrator. Contact may be daily at the beginning of the project and during the planning phase.

Participant files are to be monitored by the local area and/or subcontractor within the first 30 days of the temporary employment. The DREP Participant File Review - Employed or DREP Participant File Review – Not Employed must be used and placed in the participant’s file.

Local Area Responsibilities

The local area, and/or its subcontractor, is responsible for administering the grant at the local level.

- Maintenance of digital participant files.
- Verifying staff are enrolling participants in the NDWG and entering services correctly and accurately in the *NEworks* system.
- Retaining all work-related papers and electronic documentation, including the Worksite Worksheets, Worksite Listings, and Worksite Agreements.
- Conducting internal monitoring of 100% of files.
- Verifying adherence to state and local policies.
- Reconciling local records and case management records.
- Verifying only eligible expenses are paid.
- Verifying Supportive Services are paid according to DREP policy.
- Assessing the need for additional worksites and workers and reporting this to the NDOL on the “Worksite Listing.”
- Verifying workers are performing grant activities only.

- Entering job orders.
- Providing DREP Participant and Employer Orientations.
- Providing photographs of worksite projects before and after work is completed as coordinated through NDOL. Those photographs provided by the local area and/or the subcontractor must include the date the picture was taken.
- Recruiting worksites and workers.
- Procuring physicals, tetanus shots, and safety training for all debris positions.
- Providing information to NDOL for daily, bi-weekly, monthly, and quarterly reports.
- Reporting completion of projects and worksites.
- Notifying the NDOL Grant Administrator when a participant has been enrolled or has exited the DREP.
- Directing any programmatic questions not addressed in policy to the NDOL Grant Administrator.

Nebraska Department of Labor

The NDOL Grant Administrator will perform periodic desktop monitoring of DREP participants. Technical assistance and guidance will be provided to the local areas as needs are discovered. Worksite monitoring and programmatic monitoring will also be conducted throughout the lifetime of the grant.

The NDOL Grant Administrator will coordinate with local State staff and local area staff to take before and after photos of projects throughout the lifetime of the grant.

FINANCIAL

Because initial budgets often change, budgets should be updated, as needed, on the DREP Program Application Budget form and sent to the NDOL Grant Administrator. The local budgets are rolled into the total State budget for the grant. In addition, all line items on this form are reported on the quarterly report to the NDOL Grant Administrator.

Local areas will not be allowed to borrow or receive funds from other sources to temporarily cover any costs associated with the NDWG while waiting for incremental increases from USDOL.

As an additional reminder, all information associated with current expenditures should be up-to-date and reported on a, no less than, monthly basis. It is important that local areas submit all financial reports to the NDOL Grant Administrator.

USDOL REPORTS & GRANT MODIFICATIONS

USDOL requires quarterly financial reports and quarterly performance reports. All information required for fiscal expenditures is reported by the local areas on forms and systems provided by NDOL. All information required for performance reports are collected from participant records in the *NEworks* system.

USDOL requires grant modifications for a variety of reasons, including changing the number of participants, adding a Workforce Development component (Career and Training Services), requesting additional time, requesting additional funding, and adding a Project Operator. The modifications are very detailed to the participant level. Local areas must provide information quickly to NDOL as NDOL must review, edit, and compile multiple local areas' information and submit the modification according to USDOL's requests.

RELATED GUIDANCE

TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 02-15