



# Individual Training Accounts

Department: Office of Economic & Workforce Development

Effective Date: July 1, 2023

Directive #: WDD 23-15

Supersedes: WIA104-A.1

## **PURPOSE**

This directive provides guidance regarding the policy and procedures for the use of Individual Training Accounts (ITAs).

## **REFERENCES**

- [WIOA Section 129\(c\)\(2\)\(D\), Section 134\(c\)\(G\)](#)
- [20 CFR 680.230, 680.300 - 680.350 and 681.550](#)
- [EDD WSD21-03 WIOA Eligible Training Provider List – Policy and Procedures](#)
- [EDD WSD19-04 Veteran Priority of Service](#)
- [City and County of San Francisco \(CCSF\), Office of the Controller Accounting Policies and Procedures](#)
- [Jobs for Veterans Act, Pub. L. 107-288](#)
- [USDOL, Training and Employment Guidance Letter \(TEGL\) 08-19, WIOA Title I Training Provider Eligibility and State List of Eligible Training Providers \(ETPs\) and Programs \(January 2, 2020\)](#)
- [EDD Workforce Services Directive No. WSD19-10, Directive on the Recovery of WIOA Tuition and Training Refunds \(February 20, 2020\)](#)
- OEWD Forms: <https://sf.gov/resource/2022/wioa-procedures-and-forms>

## **BACKGROUND**

WIOA Section 134(d)(3)(G) identifies in general, training services shall be provided through Individual Training Accounts for eligible individuals through the America's Job Center of California (AJCC) delivery system. Training services provided through ITAs shall be directly linked to occupations that are in demand in the local area, the planning region or other area to which the participant is willing to locate. OEWD may also approve training services for occupations determined to be in sectors of the economy that have high potential for sustained demand or growth in the local area.

ITA funding in San Francisco is meant to complement OEWD's investment in Sector Academies (SAs) by providing additional options for:

1. Individuals who wish to pursue training for employment in San Francisco's priority sectors but for whom SA offerings are not a fit (e.g., occupation, eligibility, program schedule).
2. For individuals who wish to pursue training that will prepare them for entry into high growth occupations outside of the industry sectors supported by the SAs.

Training services provided under this section of WIOA shall be provided in a manner that maximizes informed consumer choice in the selection of an eligible provider. Service providers shall make available the [State list of eligible providers of training services](#) (ETPL) with a description of the programs through which the providers may offer the training services and the performance information and performance cost information relating to eligible providers of training services.

In addition to ITAs funded by WIOA Adult and Dislocated Worker grant funding (WIOA ITAs), Non-WIOA funding may be available to support ITAs.

## **POLICY**

For WIOA ITAs, only vendors listed on the State of California Eligible Training Providers List (ETPL) can be considered. Job Center case managers or employment counselors should familiarize themselves with the most recent ETPL issued by the State of California Employment Development Department (EDD). Customers must be advised by their case manager or employment counselor that their choice of training provider must come from this list.

The ITA request authorized by a case manager or employment counselor will be denied if participants or training programs do not meet the criteria laid out in the next sections. The OEWD service providers will not pay the invoices submitted by that training vendor and the customer will be liable for those charges if the ITA request is with a training vendor not on the ETPL list.

Non-WIOA ITAs may use vendors outside of the ETPL, but only if the vendor meets all the other vendor requirements detailed below, under Eligible Training Programs.

### **Participant ITA Eligibility**

Training services may be made available to unemployed and under-employed adults and dislocated workers who have met the eligibility requirements for an OEWD workforce-funded program:

1. After assessment, have been determined by the Job Center system to be in need of training services and to have the skills and qualifications to successfully complete the selected training program;
2. After assessment, have been determined to logistically have the supportive services in place to successfully complete the training (housing, income, access to transportation and/or technology);
3. Select a program of training services that is directly linked to the employment opportunities either in the local area or in another area to which the individual is willing to relocate;
4. If pursuing training in an industry sector supported by a Sector Academy (SA), have been determined to not be a fit for the SA offerings due to the kinds of occupations supported, the schedule of the trainings, or the entry requirements of the training; and
5. Are unable to obtain grant assistance from other sources to pay the costs of such training, including Federal Pell Grants established under title IV of the Higher Education Act of 1965, or requires assistance in addition to other sources of grant assistance, including Federal Pell Grants (provisions relating to fund coordination are found at Sec. 663.320).

The [WIOA Adult and Veteran Priority of Service Directive \(23-24\)](#) must be followed in determining which customers receive training services.

### **Eligible Training Programs**

Occupational classroom training will be provided through training vendors that are evaluated, approved and placed on the state [Eligible Training Provider List](#).

- In no event shall an ITA carry a time or dollar balance after the program of training is either completed or terminated.
- The maximum length of training under a single ITA shall be two years.
- More than one ITA may be issued to a customer within a two-year period provided the total cost of the ITA does not exceed \$6,000.
- An ITA shall cover the cost of training, including tuition and other training-related items supplied by the training provider (e.g., books, license fees, training materials, registration fees, supplies, uniforms, DMV printouts, physical examinations, immunizations, health fees and insurance) but will not include or consider the costs of supportive services.

Eligible training programs will lead to a certificate or credential that meet the requirements for Credential Attainment under WIOA ([TEGL 10-16, Change 1](#)) laid out in [OEWD Credential Attainment & Measurable Skills Gain Procedure \(WDD 20-41\)](#).

Non-WIOA ITAs may be used to fund training with vendors not on the ETPL provided they meet all the above criteria, including the requirement to lead to certificates or credentials that meet the WIOA requirements for Credential Attainment.

Exceptions to this policy, on a case-by-case basis, can be made by the Director of OEWD, should individual circumstances warrant exception.

### **Recovery of Tuition Funds**

In the event a participant discontinues training, the case manager must do due diligence to ensure the recovery of OEWD funds provided to training institutions.

Prior to approving an ITA request, case managers must verify the following:

- The refund policy of the training provider for early termination from the training program;
- Percentage of the advanced payment to be returned upon non-completion of courses;
- Turnaround time of refund;
- Time spent in training before a refund will no longer be honored;
- Requirement for the training provider to immediately notify the subrecipient if a WIOA participant drops out of a training program during the time period when tuition can be refunded.

## **PROCEDURES**

### **I. Application**

Case Manager will follow steps outlined in ITA Staff Checklist.

Customers will have the responsibility of completing their requirements, as outlined in ITA Customer Checklist, in collaboration with their Case Manager not less than three weeks prior to the first day of the start of classes. With this schedule, the student can register for classes two weeks before the first day of classes. The participant's case file will be checked in the following sections for accuracy:

#### **Individual Employment Plan**

- Is current activity recorded? *check both goals, action plan and financial plan*
- Are appropriate barriers checked? *i.e., if payment is requested for transportation, is transportation checked as a barrier; is payment in accordance with supportive services policy?*
- Is the financial mix of services recorded? *Check both IEP and case note section.*

#### **Case Notes**

- Should reflect conversations and research pertaining to the participant's eligibility, including assessments that identify participant needs and/or progress
- Should reflect monthly contact
- Should contain information on payment

### **II. Rights and Responsibilities**

The [Participant Rights and Responsibilities form](#) is the listing of the rights and responsibilities of the student, case manager and Office of Economic and Workforce Development (OEWD). These rights and responsibilities will be given to the student as soon as they are identified as potential candidates for training.

One of the most important responsibilities of the student is to apply for financial aid as soon as possible. WIOA funding for training is limited to participants who are unable to obtain any or sufficient grant assistance from other sources to help for the costs of their training, including Pell Grants.

### **III. Approval**

OEWD staff will review the ITA Voucher to confirm the following:

- The participant is eligible for an ITA as demonstrated by meeting the criteria for eligibility detailed under "Participant ITA Eligibility."
- The training is eligible for ITA funding based on the criteria detailed under "Eligible Training Programs."
- Total Cost does not exceed \$6,000.
- Signed by all parties.

OEWD will approve payment for tuition and ancillary training costs only for those training vendors who meet the criteria detailed under “Eligible Training Programs” and only for customers who meet criteria detailed under “Participant ITA Eligibility.”

If further information is needed after the application has been submitted, OEWD will notify Job Center management.

#### **IV. Training**

While a student is attending classes, the case management staff and the student will maintain monthly contact. The case management staff will establish minimum standards and goals for each student for continuing OEWD supported training. These standards and goals may include minimum GPA, attendance records, area of training, degree sought and school of record. These standards will be part of the student’s IEP.

#### **V. Increase Adjustments**

If any line item of the student’s ITA Voucher needs to be increased, the student along with the case management staff must apply for the increase by voucher modification to OEWD for approval. All procedures remain the same.

#### **VI. Close outs**

When a student completes training and the related bills have been paid, accounts will be zeroed out by case management staff and the remaining balance will be returned to the case management staff’s site quarterly allocation. Student outcomes should be recorded in Workforce Central. Follow up services to procure work in the occupation the customer was training for should continue for 12 months.

#### **ACTION**

San Francisco Job Center and case management staff overseeing the award of ITAs must ensure that the policies and procedures described herein are followed and that this Directive is appropriately maintained until further notice.

#### **INQUIRIES**

Inquiries should be addressed to Director of Workforce Strategy at (415) 701-4848 or email at [workforce.development@sfgov.org](mailto:workforce.development@sfgov.org).

#### **Attachments:**

1. ITA Staff Checklist
2. ITA Customer Checklist
3. ITA Voucher
4. Participant Rights and Responsibilities Form

*OEWD and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.*



# Individual Training Account (ITA)

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## *Staff Checklist*

### Getting Started

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- ☐ **1.** Career Advisor will complete OEWD application, collect supporting eligibility documents (if applicable), and determine the individual has been certified eligible based upon **all** of the requirements below:
  - a. Income or worker dislocation
  - b. Meets the ITA priority directive of most “in need”.
  - c. Completed basic and individualized services and not found employment
- ☐ **2.** Complete career planning OR a vocational assessment that recommends that a training best suits the customer’s needs.
- 3.** Complete the **Individual Employment Plan**.

### Identifying Training

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- ☐ **1.** To determine if the training sought is in a demand occupation, Career Advisor will review customer’s ITA Homework:
  - a. Training provider research and labor market research from at least 3 schools.
  - b. Printout of the school of choice from CalJOBS Eligible Training Provider List (ETPL).
  - c. **Labor Market Research** of occupation showing if it is in demand (O\*NET Online or EDD Labor Market Information).
  - d. Proof of job openings at entry level (at least 10).
  - e. Job Search History Form, at least 3-6 months (complete Job Search History Form or provide own method of documentation of active Job Search)
- ☐ **2.** Career Advisor check that training is on CalJOBS ETPL.

# INDIVIDUAL TRAINING ACCOUNT (ITA)

## Staff Checklist

### ITA Voucher

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- ☐ 1. An Individual Training Account (ITA) Voucher will be completed and all required signatures obtained prior to start schooling. (*Training funds cannot exceed \$6,000 and length of training time cannot exceed two years. A certificate of completion will be required*).
- ☐ 2. An **Industry Recognized Credential Attainment Form** should be completed in order for OEWD to evaluate whether the curriculum on which the credential is based, is industry recognized. This form requires the signature of the training institution, industry representative and OEWD.
- ☐ 3. Career Advisor will work with *Identified staff* to complete the ITA Voucher and Industry Recognized Credential Attainment Form.
- ☐ 4. After the ITA Voucher approval from all parties, a copy will be sent to the training provider.
- ☐ 5. All required enrollments will be entered in Workforce Central.
- ☐ 6. If an ITA Voucher must be modified the Career Advisor will fill out the ITA Voucher Modification form.

### Monitoring Progress

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- ☐ 1. Monitor customer's progress, attendance, etc. by checking in with both the training institution and the customer periodically.
  - ☐ 2. Maintain an **Individual Training Account Log** which tracks service dates and related expenses, including all training related payments and/or refunds.
  - ☐ 3. Obtain a copy of the diploma, certificate of completion or degree from the training institution for the customer's file.
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# Individual Training Account (ITA)

## Customer Checklist

### Getting Started

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- ☐ **1.** Complete **OEWD application, provide supporting eligibility documents (if applicable)** and meet eligibility based upon **all** of the requirements below:
  - ☐ **a.** Income or worker dislocation
  - ☐ **b.** Meets the ITA priority directive of most “in need”
  - ☐ **c.** Completed basic and individualized services and not found employment
- ☐ **2.** Complete the **Individual Employment Plan** with a Career Advisor.

### Complete ITA Homework

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\*Can complete individually OR with support from Career Advisor

- ☐ **1.** Training Provider: Find a **Training Institution** that provides the type of training you are interested in:
  - a.** School must be listed on CalJOBS Eligible Training Provider List (ETPL):  
[www.caljobs.ca.gov](http://www.caljobs.ca.gov)
  - b.** Research at least 3 different schools and printout.
  - c.** Determine the school of choice from the CalJOBS ETPL and printout.
- ☐ **3.** Complete and printout **Labor Market Research** to determine if the occupation is in demand ([www.labormarketinfo.edd.ca.gov](http://www.labormarketinfo.edd.ca.gov) and [www.onetonline.org](http://www.onetonline.org)).
- 4.** Identify and printout at least 10 job openings that you would be competitive for upon completion of training ([www.indeed.com](http://www.indeed.com), [www.monster.com](http://www.monster.com), etc.)
- ☐ **2.** Complete a **vocational assessment** as determined by your Career Advisor (TABE, CASAS, Traitify, etc.). This matches aptitudes and talents to successfully complete a specific occupational training.
- ☐ **5.** Complete the **Job Search History Form** or provide documentation of job search history for at least the last 3-6 months.



## INDIVIDUAL TRAINING ACCOUNT (ITA)

- ☐ **6.** Complete and sign, with your Career Advisor the **Individual Training Account Voucher**.

### Once Approved

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- ☐ **1. Commit to attending and completing training** and contact your Career Advisor if any issues arise with training.
  - ☐ **7. Provide all training related items** to Career Advisor throughout training as requested (progress reports, attendance information, copy of diploma or certification. Etc.)
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## **Office of Economic and Workforce Development**

### **Individual Training Account (ITA) Voucher Instructions**

After completing an initial assessment, and the determination is made that ITA voucher training is an appropriate plan of action for a customer, the following procedures should be used to complete the ITA training voucher.

#### **1. Individual Training Account Voucher**

- Enter the Customer Name (Last/First) and authorized training institution of the referral.
- Enter the authorized course title, course number (if applicable), and total hours. If the space provided is not adequate, an attachment may be used.
- Enter the training tuition cost.
- Enter any other training related cost.
- Enter the sum of tuition and other cost.
- Complete the Credential Attainment Approval Form and obtain signatures.
- Obtain signatures for the ITA Voucher.

This form with original signatures of the customer, Career Advisor and Training Institution should be sent to ITA Subcontractor. A fully signed copy should be sent to the customer, training institution, OEWD and a copy maintained on file.



**Office of Economic and Workforce Development  
Individual Training Account (ITA) Voucher**

**This ITA voucher covers the cost of tuition, fees, and required training materials for Office of Economic and Workforce Development (OEWD) approved educational institutions, subject to the following provisions:**

2. Authorized Customer <b>First Name:</b>	
3. Authorized Customer <b>Last Name:</b>	
4. Authorized Training Institution:	
5. Authorized Course Title:	
• Course# (if applicable)	
• Total Hours	
6. Tuition Cost:	
7. Other Costs:	
10. Total Cost (not to exceed \$6000) \$:	
11. Please check which funding streams will be utilized for this ITA.	<input type="checkbox"/> Adult <input type="checkbox"/> Dislocated Worker <input type="checkbox"/> General Fund

12. All costs must be invoiced on the standard invoice by the start of the training session.

13. Any costs recovered including refunds, financial aid and/or dropped classes are to be refunded to ITA Subcontractor.

14. In order for payment to be honored, invoices are to be submitted to ITA Subcontractor.

15. This voucher is approved for a period not to exceed 24 calendar months.

**Customer:**

I agree to participate in the training as listed above.

<b>Customer Signature:</b>	
<b>Print Name of Customer:</b>	
<b>Date:</b>	

**Career Advisor & Manager:**

I approve this training for the above customer.

<b>ITA Subcontractor's Career Advisor Signature:</b>	
<b>Print Name of Career Advisor:</b>	
<b>Date:</b>	



<b>ITA Subcontractor's Career Advisor Manager Signature:</b>	
<b>Print Name of Career Advisor Manager:</b>	
<b>Date:</b>	

#### OEWD Staff

I approve this training for the above customer.

<b>OEWD Staff Signature:</b>	
<b>Print Name of OEWD Staff:</b>	
<b>Date:</b>	

#### Training Institution:

I agree to invoice for this customer, following the provisions in this voucher.

<b>Training Institution Signature:</b>	
<b>Print Name of Training Institution:</b>	
<b>Date:</b>	

<b>Effective Date:</b>		<b>Expiration Date:</b>	
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## **PARTICIPANT RIGHTS AND RESPONSIBILITIES ACKNOWLEDGEMENT**

The Office of Economic and Workforce Development (OEWD) is fortunate to be able to use funds appropriated by the Federal, State and City government to assist you in your preparation and search for employment. This document will provide you with general information about the program, what you can expect from it and what will be expected of you. The staff of the agency, which operates the program you are now enrolled in, is available to assist you with any additional questions or problems you may have.

### **YOUR RESPONSIBILITIES**

Each participant has the responsibility to participate and cooperate in efforts to increase his/her potential for becoming employed. All participants are expected to:

- Participate to the best of his/her abilities.
- Adhere to the policies and procedures of the program.
- Conduct himself/herself in a manner that is not dangerous or disruptive.
- Report to the agency any change of address or phone number.
- Participate in job search activities.
- Provide employment information to agency or OEWD staff throughout the follow-up period.

As a Classroom Training Participant, you are expected to attend every scheduled training session and to arrive on time. Continual tardiness and/or excessive absences may be cause for termination from the program. There may be times when attendance is impossible; in such cases you should inform your instructor or counselor and let them know of your situation.

#### As an On-the-Job Training Employee:

In an on-the-job training position you are considered a regular employee your first day on the job. As an employee you must follow the personnel policies and procedures of your employer. If you have any questions about your job or responsibilities, contact the job developer who assisted you in obtaining your position.

### **IN CASE OF INJURY OR ACCIDENT WHILE PARTICIPATING IN OEWD ACTIVITIES**

Staff at your program agency or training/job site will inform you of the emergency procedures.

### **LIMITATIONS**

**Nepotism.** You may be prevented from participating in a particular program if you are closely related to someone currently employed in an administrative capacity at that agency or OEWD. If you have a relative in a supervisory or management position at the agency where you want to receive training or at OEWD, check with your counselor for further clarification.

**Hatch Act.** There are some restrictions on involvement in political activities while receiving federally funded training. Although you may express opinions on political subjects and candidates, take an active part in political campaigns, make contributions to a political party or organization and ask for voluntary contributions, you should not be involved in those activities during the hours when you are on the job or during class hours.

### **BENEFITS WHILE PARTICIPATING IN AN OEWD FUNDED PROGRAM**

There is no cost for participating in an OEWD funded program. If an agency attempts to collect a "fee" of any kind, immediately contact OEWD at (415) 701-4848. Ask for the Equal Opportunity Officer.

#### Participant in Classroom Training:

As a classroom training program participant, you may be eligible for supportive services, including transportation (Fast Pass, BART ticket), and childcare assistance. Please check with the counselor at your training program for information on what is available and the procedures for receiving such supportive services.

Speak with the counselor at the agency which operates the program you are enrolled in for information about childcare assistance. Your counselor will provide you with a childcare information sheet, which explains the requirements and benefits available. In most cases, childcare assistance is available during the entire period you are in training. If you have special childcare needs, speak with your counselor.

#### Participant in On-the-Job Training Position:

While employed in a training position, you will receive wages in return for work performed under specific commitments made by your employer. The wages you receive are subject to income tax withholding and (in some cases) other deductions.

If you are currently receiving Unemployment Insurance (UI) benefits you may continue to receive these benefits while enrolled in a Workforce Investment and Opportunity Act (WIOA) classroom training program. You are not eligible, however, for UI benefits if you are a participant in an on-the-job training position subsidized with WIOA funds.

## NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY

It is against the law to discriminate against:

- Any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- Any beneficiary of programs, financially assisted under OEWD programs on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any OEWD program or activity.

OEWD and its subcontractors cannot discriminate in any of the following areas:

- Deciding who will have access to any OEWD program or activity, or
- Treatment of program participants, or
- Employment decisions in the administration of, or connection with, such a program or activity.

If you think you have been subjected to discrimination, you may file a complaint within one hundred eighty (180) days from the date of the alleged violation with OEWD's Equal Opportunity Officer –Alfredo Fajardo, at One South Van Ness Avenue, 5<sup>th</sup> Floor, San Francisco, CA 94103. Or you may contact the Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-4123, Washington D.C. 20210. If you start by filing your complaint with OEWD, you must wait either until OEWD issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center.

If OEWD does **not** give a written Notice of Final Action within 90 days of the day on which you filed your complaint, you do not have to wait for OEWD to issue that Notice before filing with the CRC. However, you must file your CRC complaint within 30 days after the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with OEWD).

If OEWD **does** give you a written Notice of Final Action on your complaint, and you are dissatisfied with the decision or resolution, you may file a complaint with the CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

## GRIEVANCE RIGHTS

As an individual participating in an OEWD funded program, you have certain rights and responsibilities. Under the Code of Federal Regulations 20 CFR 667.600(g)(1), 24CFR570.431 and San Francisco Chapter Appendix F1.107, you have the right to grieve the terms and conditions of employment and/or training. Please contact your counselor if you feel that you have been unfairly treated. Every agency has grievance procedures within its personnel procedures that detail the terms and conditions of your services, training and/or employment. The agency, which operates the program you are enrolled in should give you a copy of these rights and responsibilities and be able to explain them to you. It is important that you follow these procedures. If you feel that your agency is not following the procedures, contact OEWD. You will be asked to provide the individual responding to your concern with complete and accurate information in order to follow up on your complaint.

You have the right to allege a violation of the regulations, grant(s), or other agreements under OEWD. If you feel that a violation has occurred, you may file a complaint in writing with OEWD. For specific information on filing a grievance, please contact OEWD. A strict timeline is required for filing a complaint (within one year of its occurrence). You also have the right to request technical assistance with filing a complaint, and may call (415) 701-4848 for more information on how to file.

OEWD may schedule an informal complaint resolution meeting prior to the administrative hearing. At the informal complaint resolution meeting an attempt to resolve the complaint will take place. If and when the complaint has been informally resolved, OEWD shall attempt to contact you and request you provide a written withdrawal within 10 days of the informal resolution

If an informal resolution cannot be reached, OEWD will schedule an administrative hearing within 30 days from the receipt of a written complaint. You must be notified in writing of the administrative hearing 10 days prior to the date of the hearing.

After the hearing, OEWD will issue a decision on your case within 60 days. If a decision is not reached within 60 days or you receive an adverse decision you may further appeal in writing to:

- WIOA – Chief, EDD Compliance Review Division, P. O. Box 826880, Sacramento, CA 94280-0001.
- CDBG – Regional Administrator, U.S. Department of Housing and Urban Development, 600 Harrison Street, 3<sup>rd</sup> Floor, San Francisco, CA 94107-1300
- General Fund – Whistleblower Program, Office of the Controller, City Hall Room 316, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102-4694
- H-1B/RTW/CCPT/AAG – The Office of Federal Contract Compliance Programs (OFCCP), U.S. DOL, 200 Constitution Avenue, N.W., Washington, D.C. 20210

## IF YOU HAVE PROBLEMS

Staff is available at the agency which operates the program you are enrolled in to provide referral information or for other personal, language, or job related problems. We hope this information is a useful introduction to OEWD programs and that you will successfully reach your employment goal.

**This is to certify that I have received copy of the Participant Rights and Responsibilities Information Sheet. I have read the complaint procedures and understand the steps to follow if I have a complaint against a program operated by OEWD. My counselor has explained these procedures to me verbally and I fully understand this process. I understand that a full copy of these procedures is available to me upon request.**

Participant Signature

Date

Career Advisor/Case Manager Signature

Date

9/2018

1 Dr. Carlton B. Goodlett Place, Room 448



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