**WorkforceGPS**

**Transcript of Webinar**

**New Grantee Orientation Series – National Farmworker Jobs Program**

**Eligibility, Outreach, and Recruitment Enrollment, Day 4**

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JONATHAN VEHLOW: Welcome to "Eligibility, Outreach, and Recruitment Enrollment." Without further ado, I'd like to kick things off to our moderator today, Laura Ibañez, unit chief, Specialty National Programs. Laura?

LAURA IBAÑEZ: Thank you, Jon. Hi, everyone. My name's Laura Ibañez, and welcome to Day 4 NFJP New Grantee Orientation. I am the unit chief of Specialty National Programs. And today Laura Tramontana, the acting national monitor advocate, who is also an experienced federal project officer, is going to be joining us today. We are really excited today because we know this is a topic that there always seems to be a lot of interest. So we're happy to give you any information that we have, but also welcome your questions throughout the presentation. We do encourage you to use the chat box as needed so we can answer your questions immediately.

Before we proceed, we're going to take a moment here to welcome all of you. And I'm very excited to see that there are about 111 of you now on, which is very exciting. If we can just take a moment – as you think about eligibility and outreach and recruitment and enrollment, I think it's always really good to reflect on why we do this work. And we've already touched on that. I remember week 1. But for this week, what we're asking you to think about is to share a meaningful NFJP moment.

I know many of you have done this work for many years. And it might be hard to pick one, but at this moment, if you could please share a meaningful NFJP moment. While people are typing, I will share mine. We were visiting a migrant housing center in California. And I was with the state monitor advocate. I was so excited to go on the site visit. And there weren't many farm workers at that time in the fields when we went. They took me to a migrant housing center. And there weren't many people out as well.

So I was like, well, I don't know if we're going to come across anybody and meet anybody here today. But as I was thinking that, I was also getting even more familiar with what services migrant housing centers offer. And I was admiring this beautiful garden. It was so well taken care of. And as we were there talking in front of this little garden, the owner of the garden, this woman, comes out. And she could tell how much joy her garden was bringing to us. And she just started talking about all the healing properties of all the herbs she had in front of her home.

And as she was talking about it, it was so organic how this conversation was taking place, because we had some real intentions. But we are not like, hey, do know about monitor advocate system and NFJP? But it was so great to see how the state monitor advocate engaged with this person talking about her beautiful garden and taking time to listen to everything that she wanted to share about her garden. And through that, it organically led to this conversation about how she was doing at work.

She was fine in what she was doing, but she had her son who she was worried about what he was going to do and wanted something different for her son. And then we started talking a little bit about that. And the state monitor advocate made the connection to NFJP. But then she went back to some issues that she was having, and that possibly could have been like no apparent violation that she was experiencing.

I think what I learned from that is you really don't know when you're going to have that moment to engage with the farm worker and what that conversation's going to look like. I learned a lot from observing the state monitor advocate in action in just taking time to just listen and talk about the garden. And it just organically happened and I made that connection. So that was fine. Laura, do you want to share your example?

LAURA TRAMONTANA: Sure. Actually, I'm sure I have many examples on this one because I've worked with the NFJP from a lot of different perspectives. I've monitored NFJPs as a federal project officer. And one of the things that I'm always taken aback by is when you talk to staff at different organizations, you can tell who's there because they really want to be there and they're invested in the program in helping people. And I've always experienced that with NFJP, which is very impressive to me.

I've also experienced it from the perspective of a state monitor advocate when I was a state monitor advocate for a little while in New York City, so shout out to New York. One of my fond memories is actually being a part of a training with the NFJP New York staff in telling them all about the complaint system that the monitor advocate system works with, and their staff being happy to have that information that they could actually be helping people resolve some of the complaints and issues that they're seeing when people come in for registration within NFJP. So that kind of partnership is really important. I'm glad that I was able to be a little part of it in my time there.

MS. IBAÑEZ: Thank you, Laura. And, yes, Christopher. I'm seeing your comment. You were there with me as well. Absolutely. I think I forgot to mention that. I was there with the regional monitor advocate, Christopher. And it was a great moment.

And it just reminds me I do not get out as often as I would like to. I live vicariously through all of you. So I see here Jennifer Hamilton – my most meaningful moment was being accepted into the work experience program that led to employment with SCSEP, which then provided me the opportunity to provide services to eligible farm workers in our area. That's incredible to have that beginning. And then it allows you to help other farm workers in the area.

I also see that Lori Waytec (sp) says just being open house and seeing a join prior to a new tenant basis. Absolutely. It is amazing to be able to provide that support when you are able to provide safe and affordable housing options for people. Thank you, Jon, as I see that you're typing these in here for me. Patricia says, participants at graduation program giving back and as for completion and seeing their proud faces and families. What a great experience to be a part of. Providing PPE to over 10,000 farm worker in Idaho. That's incredible, Kareen Gonzales (sp).

I'm just getting chills just thinking about that. That's so incredible that you've been able to make that kind of movement in Idaho. Caroline Bennett (sp) says, for me it was a formal participant coming into our headquarters years later to express their gratitude for helping them. Absolutely. And I think that's so important that – I'm sure you notice that if just for a moment you can recognize what an impact you are having across the people that you come across if you don't come across their family, but how by helping them you're also helping the family they live with.

And that's incredible. They're just never going to forget that. I also see another moment here that someone shared with Ron Bursout (sp) purchasing in a community gathering in a city park in a small Wyoming community with the MSFWs from the regional DOL farm labor crew, and being able to provide assistance with labor questions and issues, provide supportive service assistance and training options after their field seasons were completed. They are all very appreciative in having taken advantage of our programs and services. Absolutely.

And I think that really ties to what we're going to talk about today. I'm getting so emotional my voice, I'm losing it. What we're going to touch on today is just being present at those community events as you can be, whether it's related to farm worker or not, just being present when you know that the people that we want to serve are going to be there. And making that connection to the community is incredible.

And Mary Pott shares, witnessing a farm worker receive a certification of completion from one of our vocational centers and knowing how we contributed to their career path and their success. Absolutely. Attending a grand opening of a former participant insurance sales office. Wow. That's incredible to see them accomplish that goal, Theonore Barker (sp). So a couple more here. Jerry shares, seeing the cotton fields and workers in the Bootheel, Missouri, and how thankful they are to receive help in the off season. Absolutely.

Eric Zimeron (sp) says, hearing and seeing the appreciation from NFJP participants and how the NFJP has assisted them in reaching their goals that may not have been possible otherwise; remaining in frequent contact years later. And I think it's so important to have once you have that initial contact. And as they continue, I think it just speaks volumes of your commitment to be able to provide that follow-up and stay in touch just to see them evolve over the year.

And we have Suzanne Obermeir (sp) – being in tour of a farm worker housing and having the residents be so open and excited to invite any and all to come in, come through, and see their personal quarters even though there were multiple buses of us. Absolutely. Thank you for sharing. And Pat – watching the growth and successes of not only the migrant farm workers, but also of his family as they received services provided through NFJP.

And it's because of these meaningful NFJP moments that we are just so excited to talk about eligibility, outreach, recruitment, and enrollment, because we know what you have to offer is so successful to the farm worker community, and that our impact can be so great and can just go on and multiply through generations, really. I think many of you have heard my story that I've shared that my parents having that background. My mom's family was connected to farm work. And my dad was a farm worker as a young child.

And it's through these programs like NFJP that help them to see what else is possible and to explore their potential and to be told that there are so many opportunities out there for you. "What would you like to do" was just so hard for them. To even think they just didn't have many people saying that to them.

I know that many of you doing this work, you are that person for these individuals, that they do come across individuals like you that tell them and listen to them about what they're interests are, what their concerns are. So I just want to underline how important you are to this work. And I thank you all for being here today. So as we kick this off, we're going to go over a couple things. We're going to recap day 3. We're going to also talk about the participant eligibility outreach and recruitment and enrollment.

I think I've already shared why I am so passionate about today's discussion, as I think it's relevant to really make sure we broaden our net and our outreach in order to make sure we can enroll as many people as possible. So here on day 3, we talked about how you all use data in your local workforce development center to help meet customers' immediate employment needs. You also have found that through partnerships – for example, being a part of an economic development group – has helped you identify future opportunities.

We also know that you have used information from your customers, learning more about their interests and how some of them have been interested either in staying in agriculture or pursuing new career tracks that perhaps this isn't something that your program currently has; and has sort of pushed you to think about what available data is out there to help you adjust your program and your services to make sure that they are aligned with your customer's interests and needs.

And also, one thing that stood out for me as I heard Daniel and Laura speak was that although we know there were 1.9 million domestic MSFWs that are NFJP-eligible, that we understand that as we have discussed before in many occasions that sometimes their eligibility criteria can seem like it's creating limitations; and it has been difficult to enroll people when you know they need a service, but yet it's been hard for them to either meet the low-income requirement and the farm worker requirement.

But although there's that 1.9 percent, there is still a small percentage. So if we were to estimate that out of that 1.9, that at least 25 percent of them were eligible, that would still leave us about 475 MSFWs that we haven't reached yet and that we can reach and make that connection and help them get involved into either our services or other workforce development programs that are available under WIOA. So I wanted to stress that. I want to also say the reason why we're having these conversations the way we are in this quarter is that we really want to cover the basics of the building blocks.

So now that we've covered data, we're now going to move on into these other really important topics about participant eligibility, outreach, and enrollment. And then you're going to see us continue this trend as we move forward. And the next day that we have planned is partnerships. And then all of this adds up to how we assess your performance throughout the year.

Again, we are very excited that you are here today. Now that you've all shared a memorable NFJP moment that you've had and you've heard a little bit from us, I think this would be a great time to hand it over to Laura to talk about participant eligibility.

MS. TRAMONTANA: Thank you, Laura. That was a very great introduction. We're going to talk about participant eligibility. But before we talk about how to fund potential participants and how to enroll them, we have to understand who we're trying to reach in the first place. One of the core principles of all ETA grants is that grant funds can only be spent on allowable activities for eligible individuals. What does that mean? What does it mean to be eligible for services?

Well, in this context, eligibility means that an individual meets a specific set of requirements to receive services. Our next question then becomes, so what is the specific set of requirements, and where do I find them? Well, there are so secrets here at ETA. We told you what we are looking for right before you applied for the grant in your funding opportunity announce, or your FOA; which should be one of the first places that you look to determine what's allowable under a grant.

For your new grant, the applicable FOA number is FOA 20-08. And there's a link to that FOA in this slide. So now we know where to find the FOA. But the next question is, what does it say? Well, in general, the FOA says that the intent is to "fund projects that provide career services, training services, housing assistance services, youth services, and related assistance services to eligible migrant and seasonal farm workers and their dependents." You should note that we are not just looking for farm workers – we are looking for farm workers who are eligible. So let's break down what that eligibility criteria actually is.

I want to acknowledge that we have both career services and training, or CST grants, and housing grantees in the room. So I'm going to review participant eligibility for both grants. But we'll take CST grants first. For CST grants, on the date of application for enrollment, an individual must be either an eligible seasonal farm worker adult, eligible migrant farm worker adult, eligible migrant and seasonal farm worker youth, or the dependent of a migrant and seasonal farm worker. And the individual must also be a low-income individual who faces multiple barriers to economic self-sufficiency as defined in Section 6 of TEGL 18-16.

The criteria we just read points to Training and Employment Guidance Letter, or TEGL 18-16, which will help us break down what each of these terms mean. An eligible seasonal farm worker is an individual who is low-income, who for 12 months in a row out of the 24 months prior to application, has been primarily employed in agriculture or fish farming labor that is characterized by chronic unemployment or underemployment, and faces multiple barriers to economic self-sufficiency.

The basic components are low-income, primarily employed in farm worker for 12 months in a row out of the last 24 months before application. An eligible migrant farm worker being an eligible seasonal farm worker whose agricultural work requires travel to a job site such that the farm worker is not able to return to a permanent place of residence within the same day. So looking at our checklist, this means that the individual meets the definition we just went over for eligible seasonal farm worker, plus they cannot go home in the same day because their farm work requires them to travel beyond a distance from which they can return home each night.

An eligible migrant and seasonal farm worker youth is an eligible MSFW who is 14-24 years old, and who is either individually eligible or who is a dependent of an eligible MSFW. We should remember that grantees may enroll participants who are aged 18-24 as either an MSFW adult or an MSFW youth participant, but not in both adult and youth categories. Remembering back to our overall criteria for eligibility for CST grants, in addition to fitting one of the categories we just reviewed, the applicant must be low-income individual.

And we also have to note that a person only needs to meet one of the following categories that we're going to go over next. The first category is often the easiest to document. So many grantees begin their eligibility questions to applicants by asking if they currently receive, or in the last six months have received, or were in a family that were receiving, or has received in the last six months, one of the following types of public assistance: this includes Supplemental Nutrition Assistance Program, or SNAP; the program of block grants to states for Temporary Assistance for Needy Families Program, or TANFF; the Supplemental Security Income, or SSI Program; or any other state or local income-based public assistance.

What falls in the last prong in category 1 for low-income determination will vary by state. This slide includes several examples of potential state and local income-based public assistance you can consider. This can include things like Women, Infants, and Children, or WIC, benefits; medical assistance; homelessness-related assistance; emergency assistance; child care assistance; and other options on this slide or that may not be listed on this slide that apply in your state.

The key is that the state or local assistance is based on the individual's impact, indicating the program has determined the individual needs on low-income threshold. The second way of defining low-income is whether the individual is in a family where the total family income does not exceed the higher of the poverty line or 70 percent of the lower living standard income level. And we have a link here to where you can find more information on that lower living standard income level.

Income includes more than just salary or wages. It includes things like unemployment compensation, old-age survivor insurance benefits, and child support payments as well. In order to determine the total family income, we need to understand what is considered a family in this context. For purposes of NFJP low-income status determination, a family is two or more persons related by blood, marriage, or degree of court, or living in a single residence and are included in one or more of the following categories: they can be a married couple, independent children, a parent or guardian independent children, or a married couple.

Let's take an example of how we can determine family size. In this example, we have Jimmy, a farm worker youth. He's 16 years ago. He lives with his father, his father's girlfriend – who is not his mother and is not married to his father – and Jimmy's sister. Whose income is included in the calculation for family income? is the question. The answer is that the farm worker youth, his father, and his sister are included; but not his father's girlfriend.

Now let's include Uncle Bob who lives in the attic. He's right there at the top of the slide. Does Uncle Bob's income factor into the family income? The answer in this situation is no, because Uncle Bob does not fit into one of the required categories of either being a married couple and independent children, or a parent or guardian of independent children, or a married couple. So Uncle Bob is not included there.

The third way to determine low-income status is if a person is a homeless individual – which is defined by the Violence Against Women Act – or a homeless child or youth – which is defined by the McKinney-Vento Homeless Assistance Act. Another way to meet low-income definition is if the individual receives or is eligible to receive free or reduced-price lunch. We should note that the applicant does have to receive and use the lunch benefit, but they have to be eligible to receive it.

There are also some school districts that provide lunch benefits to all students regardless of the actual income. In those cases, grantees need to document that the individual would be eligible based on their actual family income. The final low-income definition categories are if a person is a foster child on behalf of whom state or local government payments are made; or if an individual with a disability whose own income meets the income requirement, but who is a member of a family whose income does not meet the requirement.

So we now have reviewed all the low-income criteria. One thing that may be helpful to NFJPs is to leverage tools and resources that your states and public service organizations use to determine low-income status. These organizations may have checklists or other tools you can borrow, which is one of the many reasons to partner closely with your public service groups.

If we remember back to our farm worker definition again, we said the individual needs to be primarily employed in agricultural or fish farming labor. That means that the individual needs to have earned at least 50 percent of their total income from farm work, or they were employed at least 50 percent of their total employment time in farm work. So what does "farm work" mean? Farm work means the cultivation, or tillage of the soil, dairying, production, cultivation, growing, and harvesting of any agricultural or horticultural commodities.

The definition is not limited to the North American Industry Classification System, or the NAICS code, as we may have thought before. ETA recommends that grantees use multiple factors rather than referring only to the NAICS codes. The NAICS codes can be some helpful resources to get ideas of what can qualify, but the take-home is that we're not limited to it. Some examples of farm work include things like: raising of livestock, bees, fur-bearing animals, or poultry. And things like forestry and lumbering operations are also included.

We also have used the term characterized by chronic unemployment or underemployment several times already in this presentation. It's important to know that the term "chronic unemployment or underemployment," as used in WIOA Section 167, refers to the nature of agriculture or fish farming as a whole and whether it experiences either chronic unemployment or underemployment. An NFJP applicant does not need to provide additional documents to demonstrate that they are either chronically unemployed or underemployed to be eligible for the program.

Additionally, an NFJP applicant does not need to provide documents to demonstrate that they face multiple barriers to economic self-sufficiency. By being an eligible migrant seasonal farm worker, the applicant essentially meets the clause because of their farm worker status and low-income status alone.

Two other key requirements are that male participants must have not violated Section 3 of the Military Selective Service Act by not presenting and submitting to selective service. If an individual is qualified as a dependent of an MSFW – (inaudible) – dependent who is a program participant is required to meet the selective service requirement because the dependent is the individual who is receiving the assistance or benefitting from the WIOA-funded services.

Additionally, program participants may include individuals with employment authorization documents who have been granted a release under the Deferred Action for Childhood Arrivals, or DACA. Now, we've talked about the eligibility factors for when you're trying to qualify someone for NFJP based on their own farm work. But additionally, individuals may qualify if they are dependent of an eligible migrant seasonal farm worker. To be considered a dependent, an individual must meet one of the following categories:

If they were claimed as a dependent on the eligible MSFW's federal income tax return for the previous year; or if they are the spouse of an eligible MSFW; or if they were not claimed as a dependent for federal income tax purposes, if they are able to establish a relationship with the eligible MSFW as a child, grandchild, great grandchild, including legally adopted children; stepchild; brother, sister, half-brother, half-sister, stepbrother, stepsister; parent, grandparent, or other direct ancestor, but not a foster parent; a foster child; stepfather or stepmother; uncle, aunt; niece, nephew; father-in-law, mother-in-law, son-in-law; daughter-in-law, brother-in-law, sister-in-law.

They also need to establish that they received over half of their total support from the eligible MSFW's family during the eligibility determination period, which is 12 consecutive months out of the last 24 months. Now, let's go back to our household. Only this time, let's pretend that Uncle Bob is the farm worker. Uncle Bob meets all of the MSFW eligibility criteria for himself. Jimmy is 100 percent supported by his father, not Uncle Bob. The question then is, can Jimmy qualify for NFJP as a dependent of Uncle Bob?

You can type in. We'll take a chance and type into the main chat and think about this scenario. What do you think? The question is Uncle Bob's in the attic. He's a farm worker. Jimmy, however, wants to qualify for NFJP, but is not supported by Uncle Bob. All right. We're seeing a lot of no's. The answer is no – as you all got – because even though Jimmy has a relationship to Uncle Bob, he cannot show that he received over half of his total support from the eligible MSFW's family during the eligibility determination period. So it's good we're on the same page here. Now let's complicate things a little bit. Let's pretend Uncle Bob is actually rich Uncle Bob.

Uncle Bob's in a penthouse, not an attic. Uncle Bob has primarily worked in farm work, though, for the last 12 consecutive months. Rich Uncle Bob 100 percent supports Jimmy and everybody else in the household. So the question now is, can Jimmy qualify as a dependent of Uncle Bob? What do you guys think on that one? I'm seeing some more yes's. I see one person is really spot on. We have Lupe, who said yes, but will be over income. My answer is rich Uncle Bob likely doesn't meet the low-income requirement. If rich Uncle Bob did meet the low-income requirements somehow, though, then probably yes, because he's supporting everybody, including Jimmy.

But that rich factor kind of complicates it there. So there are a few other concepts that we need to remember. The first is eligibility determination period. The eligibility determination period means any consecutive 12 months within the 24-month period immediately before the date of application for NFJP. An applicant's eligibility determination is valid for 60 days from the date of the initial application. After the initial 60-day period has closed, if the individual has not enrolled as a participant, the grantee will need to update information and recertify the applicant.

You should note that when an applicant was unavailable for work in the period immediately before the date of application because they were unavailable for reasons of the armed forces, or they were institutionalized, institutionally confined by incarceration or a similar condition or a legal detainment, hospitalized or otherwise unavailable due to a documented disability, in those cases, grantees can establish an eligibility determination period during the 24 months immediately preceding the date of such unavailability. This is provided, though, that the period may not begin more than 48 months prior to the date of application.

Let's take a moment to review participant eligibility for housing grants. For permanent housing assistance services on the date of application, the individual must be an eligible migrant seasonal farm worker, an eligible migrant seasonal farm worker family, other individual, or other families. The same definitions we reviewed earlier apply to eligible MSFW. So for the purpose of housing assistance, "family" means an eligible MSFW and all individuals identified under the definition of dependent in this section who are living together in one physical residence.

Other individuals are included because permanent housing developed or renovated with NFJP funds must be promoted and made widely available for MSFWs; but occupancy is not restricted to eligible MSFWs. Providing housing assistance NFJP-eligible farm workers should be the priority, however. You should also note that the same low-income criteria applies to housing grants. And for temporary housing assistance services, the individuals must be either an eligible MSFW or an eligible MSFW family and low-income.

This slide includes links to several sources of policy guidance for NFJP eligibility. And I recommend you go through at your leisure to get some more important information in there. All right. We do have a break scheduled now for five minutes. And we'll return. I see some questions have come in. We'll, after the break, see what we can address in those questions as well. So starting right now, five minutes on the clock.

MS. IBAÑEZ: And, Laura, if I could just add before they go off to break. If you all get a minute, we're also going to have a part where we're going to ask you to share either this outreach material that you've developed. And I know that many of you have this available online on Facebook or anything that you have. And if you don't have that link to share, feel free to report out what type of outreach materials you're using these days. Thank you.

Hi, everyone. We're back. That was five minutes. That went by really quickly. And we're excited to continue this conversation. Before we go into our outreach portion of this conversation, we want to make sure we answer some of these questions that are here. Laura, we have a question about the eligibility determination period for low-income and farm work status. Would you like to answer that?

MS. TRAMONTANA: Sure. The question is whether the eligibility determination period for low-income status and the period for determining whether somebody has done qualifying farm work within the applicable time need to be the exact same period, like the same month or each of those things. And the answer is no. They don't need to match up on that specifically. There's another question about what documentation could be used to show that an individual family are homeless.

And we're going to be talking more about that in a later section today. But there is a Frequently Asked Questions that we have published. And I believe Jon just put it into the main chat so you can follow that. And there's a link to that with information that'll answer that question for you and give some examples.

MS. IBAÑEZ: Laura, would you like us to hold off on question 2 until later, because we have the answer? Give it later, do you think?

MS. TRAMONTANA: Sure.

MS. IBAÑEZ: Okay. We'll share our answer for number two later. Did you want to address number three?

MS. TRAMONTANA: Yes. Number three on our list is going back to our example with Uncle Bob, if I can show you real quick. We have rich Uncle Bob in the attic. And the question is if the other individuals are dependents of Uncle Bob, does the poverty standard change so that the dependents are eligible? Remember, the individual family needs to be low-income. So the issue we're encountering with rich Uncle Bob in the penthouse is that the family overall will probably not meet that low-income threshold.

MS. IBAÑEZ: Thank you. I'm sorry. There's just a little confusion. I see that Jon posted two resources for you. And one is the FAQ. And then the second one is where you can find the answer for number two. And we're going to dive in deeper to answer that. But if you look at TEGL 23-19, attachment 2, it goes into what source documentation is necessary. And I'm going to pause and leave it there. But just a tip for you. You're going to want to look at PIRL data element 802. And then that's going to refer you to PIRL data element 800. And then Laura, I promise I'll stop there.

So let's go into outreach and recruitment. First thing I just want to say is that now that you've learned a little bit about program eligibility, we're just going to talk about the basics of outreach and recruitment. And I'm telling you now you are probably wondering why we are telling you outreach and recruitment. So before I dive in, I just really want to acknowledge to you as that in this area, you are conversing a topic. And a majority of you and all of you really are well established in your communities. You've developed trust with the farm worker communities. So we know you know how to do outreach and recruitment.

The purpose of this is really just meant to be reflective and to encourage you to tighten up your outreach plan in this ever changing world. And as you know, it's changed a lot for us in how we do the work that we do, and specifically outreach with COVID-19. This is an opportunity for you to rethink how you make that initial contact. What does follow-up look like these days? What is your messaging? How has all of this been affected by the current economic challenges and COVID-19?

So we know that we wanted to touch on this, because the FOA specifically asks you to provide this information. So we are really just giving you this information to make sure that we let you know how important it is for us to communicate this to you, and that we definitely want to support you in your efforts. And not only us, but your FPOs are really there to help you rethink about your outreach and recruitment in order for you to meet your enrollment goals. So I'm going to move us along.

As I just mentioned right now, when you applied for the NFJP funding opportunity announcement, you were asked to develop an effective and reasonable participant outreach plan to cover your state's service area. Due to the nature of agricultural work, farm workers experience challenges to find stable employment, and may have limited access to education opportunities and other resources. So they may feel comfortable going out to you because maybe they had a positive experience or they know that you've helped somebody in their community and they trust you.

And some may feel not comfortable at all reaching out for help given the climate that we're experiencing right now. So it may take a little bit more to actually reach some of those harder to reach individuals. So the purpose of creating an outreach plan is to locate and contact migrant seasonal farm workers who are not being reached by normal intake activities. May know you very well and will want to reach out to you because they have had a positive experience. But this is really for people who are not walking into your office or have not been referred to you by an American Job Center.

So we just want you to rethink your outreach plan and what that looks like, and also in how you recruit farm workers in the service area that you applied for. The second piece of this is – there are cases where people are not eligible. So how do we give them that customer service and make sure that they're referred to a local one-stop center or other partners out there that we know that can help them? And just because they may not be eligible, maybe somebody else that they know might be eligible and they can definitely refer back to you, if that makes sense.

When you're developing your outreach plan, you're doing an assessment of needs. You're figuring out your target audience and what their needs are. You're thinking about the areas that you're covering. And you're conducting surveys. You're doing workshops and public meetings. You're going to church. You're going to the market. You're going to wherever you think you can possibly make that connection. It could be the weekly farmer's market that's happening in your community.

You have thought of so many creative places of where you can make connections with farm workers. And if you're not able to make that connection, you've identified community leaders and organizations that do serve farm workers that can help make that connection for you. And that can be partners can be one should definitely be like your state monitor advocate.

If you haven't already, I definitely encourage you. And I know many of you have. State monitor advocates, community colleges, or any other public school system, or school systems in general out there. One thing that we also ask you to do in your proposal to the funding opportunity announcement was describe your outreach efforts – what that was going to look like quarterly and annually, and how many contacts you were going to make. Because we know that making that initial contact is so important.

And then there's making sure that you actually have follow-up. We've seen – I'm telling you it's something like the last seven months there's definitely been new energy and new ideas that have come out of the challenges that we're all facing. I've seen you and the monitor advocate system partners come up with such incredible ways to do outreach and connect with farm workers.

So I definitely encourage you to chime in, throw in ideas if I have any in the chat box. We also know that Laura Tramontana, who has experience in this, is not only the acting NMA, but as a federal project officer is going to be chiming in. I'm going to pause in between slides so that Laura can chime in.

MS. TRAMONTANA: Is it now my turn?

MS. IBAÑEZ: You want to chime in already? Let's go!

MS. TRAMONTANA: I can chime in already. Yeah. I was talking about different constructive and interesting ways that grantees are responding to the pandemic in a way that we might not have thought about before, and might not have been necessary before.

Some of the things that I've seen, for example, grantees from NFJP and some other programs, as well, outside of the NFJP grant family that are providing things like Chrome books and things that they've effectively budgeted for in their budget. So you'd have to talk with your federal project officer and make sure that things are okay and allowable for what you have set up.

They've provided Chrome books to participants so that they're enabled and have the tools to participate in virtual services, which is a step beyond saying we're going to transition to virtual services. But people might not be able to participate in those services if they don't have the tool necessary to log in or they don't have reliable internet.

I've also seen some of my own grantees in the past who are working closely with internet providers and have programs that are out there to make sure that the internet isn't getting turned off on them if they can't pay the bills. And there are special services for that, too, that they're coordinating, which I think is fantastic.

I've also seen some grantees do outreach to other family members and educate the whole family about what the program does so that when one of their family members is participating in it, they have the support of the whole family to say, what they're doing is important and I'm going to support them in doing that as well. It just kind of helps the overall ability for a person to participate because at home it's supported as well.

Additionally, there are some grantees who have some really great partnerships with other support agencies. We think a lot about food security. But there's also emotional security that goes into what's going on with the pandemic specifically.

I have a grantee who's working closely with a crisis counselor who's able to provide support to people to just help them work through, what does this world look like to them? And if they need to reach out and get some support for counseling, they can do that. If they don't want to, that's fine too and there's no pressure to use it. But knowing that that's there, helps take a really holistic approach that I think has been helping with enrollment for some of our grantees. I'll give it back to you, Laura.

MS. IBAÑEZ: Thank you. So I welcome you, Laura, to chime in as we move along to these slides. And I never would have seen that. We're already almost about an hour and I kept this because we're so passionate about this topic. We are going to move along, but we can answer some questions and hear from you. The basics of outreach and recruitment – community presence, making yourself known, whether that's being a part of your community groups, going to church, reaching out to your health organizations, any social services out there that you know.

Just know of your services. If you have community colleges near you, do they know about you? And do you have a contact that you can constantly communicate? Do they ever feel like there's someone who could possibly be referred? I think it's important for people to really know what you're offering. I know Laura just touched on this. Knowing what marketing and community piece areas will be effective. I've seen some really great examples out there. And then what areas or locations will conduct outreach and recruit participants from?

I think this is such a critical time because we know there are people that need our services. There are people that need your support. Yet for some reason, it may be harder to reach them. And there can be multiple reasons. I would like to ask you if you can chime in at this point. I see that Chris shared something right now – during COVID, a main we created or recorded Zoom presentations about NFJP eligibility and services they're interpreted into Haitian Creole and Spanish and posted on agency Facebook. That's an awesome idea. That's such a great way to get information out there.

Let us know what you're doing. I know you all are experts in this area. But we've had to really rethink how we do things. I think you all have stepped up to the plate and have accomplished that. If you have great ideas about how to set that community's presence – what partnerships have been the most helpful for you – I definitely encourage you to share that.

One of the key partnerships as under the regulations 20 CFR 653.108 – one, your state monitor advocates are to have an MOU with the NFJP grantee. And I want you to know since that regulation has been out there – and we don't know PY 2019 data at the moment because states are still completing the reports for that period – but just looking at what we've seen for PY 17 and PY 18 because of that MOU, there's been a 9 percent increase in outreach contacts, which is incredible to see. So we know that partnerships work. Definitely work closely with your state monitor advocate to see how you can get the word out there.

The other thing we want to talk about is changing the method and not the message. I know many of you have said this to us. The message may be the same, but sometimes the methods are changing but the message is still the same. So I know Laura just shared an example, but if anyone would like to share how you are changing the methods but not the message. And some of us have actually had to think about how to change the message, as well, and how we collaborate with partners, the state monitor advocates, consulate, employer engagement, employee advisory councils, social media platforms virtual outreach, migrant coalition groups.

I see here that Patty has shared that – (inaudible) – identifies training veterans colleges that cater to farm workers, and we partner with them to connect with participants. That's a great idea. We also know that if you leverage technology – I think many of us have had to do that during these times – you have to think about what resources can you outsource? What has been effective and what are some promising practices? Which has been very critical to this time.

We've heard people say that they use Zoom, that they use What's App, that they're using Facebook, that they're using radio to make sure that people can hear them and get the message out there. We know that other methods have worked for you all, like phone calls, text messages, emails. Are there any creative ways that you are leveraging technology to support your outreach or recruitment efforts? Laura, do you want to chime in at this point?

MS. TRAMONTANA: Yeah. I know NFJP grantees have been using some technology for a while now, right? It's not uncommon to see Facebook as to have things on Instagram and whatnot, which I think is important, especially if you're going to be targeting some MSFW youth. And, Laura, you had talked about in some cases the message stays the same but the method changes. And then hinting too is right. Sometimes we do have to change the message itself.

One thing that I think we should be considering at this time is the message of how we're explaining our services and how our services of the NFJP can be adaptable and appropriate to somebody who is not going out as much because of COVID, or might be affected in other ways more severely because of COVID. The thing that I've discussed with some grantees in the past has been how do we market our program essentially? And remember, I'm using the right marketing, but it's really recruitment because that's an allowable charge under our grant.

So how do we message our recruitment strategies to say to somebody who is thinking about now? COVID-19 has created a situation where the world is thinking about today, right? They're not really thinking that much about future goals because they're just focused on what's going on. So part of our messaging could be redesigned to say, we understand COVID is affecting us in a way that's making it so that we have to focus on right now – our health right now, our family right now, our income right now.

But there will be a tomorrow where we will get past this. And we are here now to provide you services, to enroll you in your program. And you can be doing that now virtually, or whatever you're doing to adapt it as necessary. And make it so that while everybody else is thinking about just right now, you are thinking about right now but you're also very easily participating in our program that's going to make it so that tomorrow, in the future, when we're released from the scrap of the pandemic, you are one step ahead.

Because you've been doing things with us now for NFJP that have upskilled you, that have increased your wages, that are putting you in a place that you're competitive when we come out of this. So trying to focus your audience into what we can do, how we're going to make it easy for you could be really important in the ways that we are putting out marketing for recruitment purposes.

MS. IBAÑEZ: Thank you. Now we're going to invite you all to share a link to your digital outreach materials in the chat box. We've seen quite a few out there. If you could just share a link. One that we came across I think was OHDC, Oregon Human Development Corporation. They made a video that they put on their Facebook page. And it was in Spanish. And it was using, translating your outreach materials like to the primary language of your target audience is very key. It was such a catchy video that there were 637 likes and 65 comments.

But the messaging was like, if you know someone in Oregon who works in the fields that needs help, tell them to reach out. And also, if you're interested in moving to Oregon, we're here. It was very positive, very supportive. It wasn't just like, let's enroll you in our career services and training. It was like, we have wrap-around support. We can definitely be there for you. Definitely, it was a great find. And I see that there are more examples here.

And it seems like you guys are posting on your website or YouTube. So please share so that we can all beam for a minute, take some pride in how you had to step up and use digital outreach. I think it's something really great. We have more examples. We encourage you to share your link in this box. I'm going to move us along because I definitely want to pause after the session, Laura, to answer these questions if we could here. Outreach resources – there are some resources available on Workforce GPS. We have this site. We didn't tell you how much we have on it, I think we wouldn't be doing our job.

And we definitely want you to know that there are some great resources that have been developed either from an NFJP perspective or also the monitor advocate side, which outreach is such an important part of the monitor advocate system. There are some tools that are available here. I'm going to move us along so we can now discuss a eligibility scenarios. And I see that there are questions here, Laura. And we're almost at our end. Do you want start to answer some of these?

MS. TRAMONTANA: We can answer the questions that are in the box right now. One of the questions from Lorena is asking if an individual works in the fields for a single employer all year round but that employer has various crops depending on the season, can the individual be considered to be eligible if their hours significantly change due to season that they are working and yet they're still employed? And then Lorena wanted to make sure we understand that the person's employed all year round, same employer.

In that scenario, I think what that question really comes down to is, remember early on we said that a person does not have to prove chronic unemployment or underemployment? And they don't have to prove the facing multiple barriers to employment. We look at farm work as a whole as meeting those requirements, so the person that you're describing appears to meet the requirement to be employed in eligible farm work. And that is the bulk of the question.

MS. IBAÑEZ: I also see that one we referred to earlier was TEGL 23-19. And I know that Laura included the attachment to you. And something that I just want to point out – low-income status at program entry is PIRL data element 802.

As Laura pointed out in her presentation, it's either one of those six ways to qualify. So if someone is homeless and then tells you see data element 800, when you go to data element 800, as far as supporting documentation, it's either self-attestation, nine intake application enrollment form, written statement or referral from a shelter or social service agency, a needs assessment, case notes, signed individual service strategy, or a letter from case worker or support provider.

And what I really want to emphasize here is that when you look at attachment two and you're looking at that supportive documentation call, please pay attention to the following. It doesn't have to be all seven. It could just be one of the following. So we want to just flag that for you. And I'm sure you're probably looking through that TEGL a little bit closer. So I hope we answered that question about what documentation could be used to prove individual or family are homeless. I think we have one more, Laura. Do you see that one that just got posted?

MS. TRAMONTANA: Yes. I see a question that says, I have a question in regards to the explanation of the 12 consecutive months for eligibility. So what it actually is is 12 consecutive months within the last 24 months. So you're looking for – for example, if the person was 12 months in a row but it was within the last 2 years – so it was 2 years ago at that point on the longer side of the 24 months – that's fine, to meet the eligibility determination period there for completing farm work. So it could either be anywhere between the 24 months as long as you can pick out 12 months in a row where that condition existed.

MS. IBAÑEZ: Thank you, Laura. Do you want take it away and go into eligibility scenarios?

MS. TRAMONTANA: I sure do. We're giving some scenarios for dependents. One example, Mario is a male. He was 21 years old and is interested in qualifying for NFJP services under his uncle who is a farm worker. And he lives with his uncle. The question, if you can put in the chat box, would be, is Mario eligible? All right. And I'm seeing a lot of yes's. If they are low-income and the family qualifies based on that, yes. All right. Another scenario for year-round work.

A seasonal farm worker performs eligible farm work from June to mid-October. From late October through March, he is provided 4 hours a day in the farm gift shop, which is open Thursday through Sunday. So the questions are, what information is needed to determine if this person is eligible for services through NFJP? And is this individual earning at least 50 percent of their total income from farm work for being employed at least 50 percent of their total time in farm work?

So if the answer to those questions is yes, that the individual is earning at least 50 of their total income in farm work or 50 percent of their time in farm work, then that'll help us get to a yes for this person, as long as they're also low-income.

MS. IBAÑEZ: And, Laura, I think this example here also touches on the question that's being asked in the box.

MS. TRAMONTANA: Yes. If a participant worked only 6 months, are they not eligible? If the person worked only 6 months total, then the question still comes down to whether the person is primarily employed in farm work would that 50 percent of time or 50 percent of earnings being in farm work? So your amount of time – if they're only working 6 months overall in the year but primarily that was in farm work, then we'd still be into the yes category for that.

The next scenario for H-2A workers in emergency assistance. Could we provide emergency assistance to H-2A workers? In some situations, yes. We do provide emergency assistance to H-2A workers. However, we have to remember that an H-2A worker – to kind of backtrack on what an H-2A worker is, the H-2A visa program is an outgrowth of your state workforce agency's agricultural recruitment system, which helps find workers on a temporary basis for farm jobs or agricultural employment.

When we can't find people domestically for those jobs, employers can file for H-2A applications and they can bring in farm workers on a temporary basis for those jobs. In theory, the H-2A worker who's on the H-2A visa should have all that they need from the primary employer through their work contract because the employer has to be providing things like housing, access to food or providing meals themselves, access or providing laundry facilities and things like that.

So if you're encountering an H-2A worker who's coming in and saying, I don't have enough money for food, that's a problem. And you should be talking with their state monitor advocate about that to see if there's something that the state can do to help. However, there are some emergency assistance that would qualify for an H-2A worker, but we expect it should be something that you should be talking to your state monitor advocate or your outreach partners at the state to fix this.

All right. Our continuous improvement plan, we want to identify some barriers and redefine our approach in different ways. For outreach and recruitment, we want people to know what NFJP is offering. We see it as very important. And we need other people to see it as important too. So our message should be conveying that. In your program design, it doesn't mean only physical access. So when we're thinking about how we might need to redefine what we're doing, we should be thinking about outside-of-the-box ways that we can be redefining to make things more adaptable, kind of how we were discussing early on with what people are doing in the wake of COVID.

And then one of the common things that we talk about year to year is participant eligibility requirements. We're very concerned of the grantees about making sure that we get those requirements, because I think we're all afraid of people like me who come out as a federal project officer and monitor. And the last thing you want is your FPO, your federal project officer, to come out and say that something is not allowable because there's not sufficient documentation to support it. We totally get that concern. However, there is a balancing that we need to do.

And the other side of that balancing is making sure that we're not creating extra barriers for our self. And so from our FPO perspective, one thing that I always counsel on is that ETA establishes minimum requirements. And you have to meet those minimum requirements. But a grantee can establish extra requirements by your own program policies or standard operating procedures, things like that. And in that case when ETA comes and monitors then, you're going to have to meet, addition to our minimum requirements, the requirements you guys set yourself.

So it's a balancing, like I said, to make sure that you're being efficient and effective, but not overly burdening your own participant entrants and your own program's abilities to work effectively. So think about your requirements and make sure that you're not creating barriers that make it more difficult for people to register and to enjoy the services. This goes back to Laura's statement about you only have to sometimes – and in most cases, maybe always – meet one requirement of, for example, the low-income. You have to meet one thing on those lists that gets you into meeting that requirement.

And if your program is saying, well, we want to be extra safe and make sure that they meet two, that could be getting people in a situation where they can't enjoy the program as well. So the last thing on this slide is about program performance targets. We negotiate the performance targets. And you want to make sure that they are realistic, keeping in mind their MSFW needs. Additionally, some grantees will establish some tighter requirements internally. Again, we want to make sure you're not making things harder on yourself.

It's always good to strive high and meet those goals, but you want to make sure that you are providing quality services even if it's a smaller group, as long as it still complies with ETA's performance targets and that you're meeting those goals. All right. We had a break scheduled here. But unfortunately, we talk a lot, so we are going to charge through it and go on to our next content, which is tools and resources. There are several tools and resources listed on this slide.

We have your Workforce GPS, which if you're not already a member, you should definitely sign up. You'll need that access to register for webinars and training. There's also the DOL website farm worker page, which has information for NFJPs and the monitor advocate system if you want to learn more about that. And the Association of Farm worker Opportunity Programs, or AFOP, website too. I put in an extra plug here, your federal project officer is your main tool and resource. If you have any questions about the grant, they're basically your program guide and should be one of the first places you go for information.

Now, moving into enrollment, NFJP grantees are required to have an eligibility determination system that enables the generation of a record that supports eligibility determinations and enrollment decisions, including program participant status, low-income status, and other things. There are several regulations that apply here. Specifically, WIOA says, in preparing the state reports described in the subsection of WIOA, each state shall establish procedures and ensure the information contained in the reports is valid and reliable.

Grantees can use TEGL 22-15, attachment D, as an interim guidance for how to document eligibility requirements. For example, there are forms of source documentation that we have there for the number of individuals and family. Some examples there – birth certificate, family bible, IRS 1040 form. Again, you pick the one that's available to you. And you don't have to provide several in that case.

Also, information on source documentation for things like employment status, preprogram earnings, etc. The main important thing is to maintain reliable documentation or proof that all participants meet eligibility requirements. And that can be achieved through some alternate sources. And additionally, if there are questions when you're enrolling someone, you can always contact your FPO for guidance.

We have mentioned before this TEGL 23-19. And we did have that question before about homelessness and how you would document that. Laura had shared this TEGL attachment 2 will show exactly those pieces of information that you can collect and some of those things. For example, for homelessness on the list include case notes, needs assessment, a signed letter from the service agency or from a case worker could also apply in those cases.

This slide has some other examples for date of birth for additionally the eligible migrant seasonal farm worker status that are listed here. In your eligibility determination system, you have what we call the management information system, or MIS, which generally refers to a specific detail information that supports an element stored in the grantee's information system. Additionally, to that and sometimes within your MIS system, you can input case notes that refer to a paper or electronic statement by the case manager.

And that should identify things like the participant status for a specific data element, the date on which the information was obtained, and the case manager who obtained that information. Case notes can be a really important thing that fills in the gaps when there are questions. If something appears off in a file, there should be a case note to explain that thing. And your FPO will go straight to the case notes to try to get explanations when problems like that arise.

There are a few other definitions I want to make sure we cover. One is self-attestation. Self-attestation is when a participant states his or her status for a particular eligibility data element and then signs and dates the form acknowledging that status. Key element for self-attestation is that the participant identifies their status for a permitted element and the participant signs and dates the form, attesting to that self-attestation. The form and the signature can be on paper, or it can be in the MIS system with an online signature. Either one is fine. ETA wants to move into the future of technology as well.

Self-certification is different than self-attestation, which we just went over. Self-certification is a statement that all applicants have to sign that certifies that the information that they gave to you as the NFJP grantee for the purposes of you determining whether they're eligible to receive services is true and accurate to the best of their knowledge. It's basically a statement at the end of everything on an application usually saying, I certify that I didn't lie to you, right?

And we have an example on this slide that you can borrow if you need to make sure that you are meeting that requirement, because that's a requirement for every application. Additionally, staff determination is another term that we use. Staff determination is a signed statement that's made by staff which documents that the staff member has determined that the person is either eligible or not eligible for services.

So we talked about what eligibility is, what those factors are. And so staff determination is a requirement that the staff at the end of everything collecting all the information and reviewing it, making an educated decision are saying, this person is or this person is not eligible. They're not just saying, I reviewed the file. They're saying, this is my determination. So those things need to be in every file – the self-certification statement by the applicant and a staff determination statement by the staff person.

MS. IBAÑEZ: Hey, Laura. We have about three minutes. Maybe we could – I don't know. Just checking in with the group here, is it okay if we go over a little bit past 4:00? Jon, does that work for you and Laura?

MR. VEHLOW: A couple minutes over, no problem at all.

MS. IBAÑEZ: As far as saying yes, they can hang on for a little bit more so that we cover some important information? Okay. Thank you.

MS. TRAMONTANA: All right. Great. I'll give the abbreviated version for the last and hold my own personal comments as much as I can muster. We've also in the past transitioned to WIOA, talked about difference between participants and reportable individuals. Takeaway for a participant is there are certain services that will kick somebody into a participant level. There's a TEGL listed on this slide that has information and a chart specifically that tells you what triggers somebody to be a participant-level service.

And so a reportable individual, however, receives more basic services, basically like a lot of independent services that they might be doing themselves, I think of commonly. But I would encourage you to check out that chart on TEGL 10-16, attachment 7. And it's really going to be helpful to you. Importantly, participants are included in the performance outcomes for WIOA, but reportable individuals are not. And that's very important to make sure that your data people are excluding reportable individuals so that your performance numbers don't suffer and appear to be less than they actually are.

So we did talk already about H-2A workers and emergency assistance in our scenario earlier. So just remembering the concept there is yes, you can provide some emergency assistance; but you should be looping in your state monitor advocate whenever this comes up because it could really indicate some underlying problem with the work contract, and something that maybe the H-2A worker might not be getting that they're supposed to be getting.

There are a couple of pre-eligibility questions, for example, that we've put in here for your use. And you can review them as well following this presentation. Some examples for the male participants 18-plus, are you registered with selective service? Remember we said that was important. Are you married to someone who works in seasonal farm work? That could help somebody get into being qualified as a seasonal farm work dependent. And the next question there is, is that general? Are you a dependent of an eligible farm worker? One thing we want you to remember when you're thinking about your questions is break them down.

So if you asked somebody off the street, are you a dependent of an eligible farm worker? they need to know what it means to be a farm worker. They need to know what it means to be an eligible farm worker. And they need to know what it means to be a dependent. If you break these concepts down the way that we did at the beginning of this training, taking one by one, it's really going to help you get results that are more informative and more accurate, which is very important.

More questions on this slide. We talk about the second question here, tell me about the work you've done in the last two years. Leave it open-ended. Maybe people are – if you asked them again, have you been employed in farm work for the majority of their time? they might not know. But if you ask them what do they do? Well, I worked at a poultry plant, and my job was to separate chickens. Okay. You're not thinking about it as – (inaudible) –, but maybe we are. And we can break that down as staff to get to some of those questions.

I think training your staff really on the questions to ask and really having mastery of eligibility determination is going to help here when you're doing your intake. More questions identifying barriers to employment, homelessness and transportation to identify some barriers to employment information about whether they're in school, if they're receiving some public assistance is very important to ask about as well.

In general, the best practices for enrollment – explain the process and questions to your applicants making sure you're regularly training your staff. Sometimes if you've had staff for a long time, we think we don't need to retrain them. We do. People forget. People get comfortable. It's important to keep training people and just honing those skills and having regular content on those. Also, we encourage you – there are other organizations who are serving similar customers that you can borrow checklists from. Those organizations that work with low-income individuals and need to certify people as low-income themselves, you might be able to borrow those checklists from them as well if you have good relationships with them.

Always, always, always, when you have questions about what's allowable on your grant, look at your funding opportunity announcement that we mentioned as well. And first and foremost, if you forget everything we talked about today, talk to your FPO, your federal project officer because they're your guide. It's literally their job to do this and to help you. And they're invested in your success the same way you're invested in your success. They want to see our investment from ETA's funds succeed and actually help people, and so we're here to help. And, Laura, if you'll take it away for our next steps to close out.

MS. IBAÑEZ: Sure. A couple questions here. I'm going to slide through these. This is day 4. Following after this, we were going to cover partnerships and service delivery. And then the big final one is the grant reporting requirements.

And then as a follow-up, we decided to add a day 7 so that we could have a debrief and just leave it open ended. You'll have all of us there, and we'll just answer any questions that you may have. Here is some pre-work that we'd like you to look into. I know you're all super busy, so if you just get a minute to click through, these are additional resources that are available that are going to be referenced on day 5.

Here are some additional grant resources. You all know where the FOA is now. You know about TEGL 18-16. TEGL 28-16 is also something you should know about as it relates to best practices and partnership models. We've got a polling question. And I think if we could start the polling question, but while they're answering, Laura, I would like to address these questions here in the box. Do you want me to answer 8; you can answer 9?

MS. TRAMONTANA: Sure.

MS. IBAÑEZ: Okay. So if I'm reading this right, how would Mario establish a relationship with his uncle – an applicant statement or something else – if the uncle hasn't claimed on his income tax? So if we're trying – and this seems like it's related – probably it's the slide that we talked about dependents.

And if so, if Mario wasn't claimed on his uncle's income tax, according to TEGL 23-19, attachment 2 – which we shared earlier in the chat box – if you look at data element number 808, it says one of the source documentations could be self-attestation, case notes. If you haven't had cross maps or public assistance records or additional eligibility documents, it sort of gives you examples.

So we ask that when you're looking at these closely, that you think about what does the TEGL say? What is this TEGL 18-16, right? And that's how we define dependent. And then you go look at TEGL 23-19 and you look at PIRL data element 808, and then it gives you examples of source documentation if that person isn't on that person's income tax. And I also ask you to work closely with your FPO, because the FPO at the end of the day if they were to monitor, you would have to set – they would let you know what would be acceptable or not.

But use these two TEGLs as a guide. And this is Laura. I mentioned earlier case notes and self-attestation, there's definitions in the slides what that means. And of course, you would have to read this at your organizational policy, because I know that all of you have separate policies in addition to our guidance. Do number nine, Laura. Do you want to answer?

MS. TRAMONTANA: Sure. The question is, can we assist H-2A workers with emergency-related assistance such as transportation or short-term housing while they're in a labor dispute; or to travel home to their home country after they're fired from the job since we are not assisting with retraining or stabilizing agricultural employment? In general, yes. H-2A workers can receive emergency assistance that would include transportation and short-term housing.

If it's because of a labor dispute, I think that would still apply that your NFJP could assist with transportation and short-term housing. One thing that this question brings to light is relation to the requirement related assistance and the definition of related assistance of which emergency assistance is a four. So the related assistance definition says that the person should be, I think, engaging in some way in other services through NFJP or to retain or stabilize their employment. So in the case of somebody going home, they might not be needing all of that requirement.

And so this is something that you would absolutely just need to loop in your state monitor advocate about in making sure that if the employer should be providing that service, because it brings to light the question of whether the person was let go for cause or not for cause. And if it was not for cause, then the employer could be required to pay that return in transportation itself. Laura, do you have anything else to add on that topic?

MS. IBAÑEZ: Yeah. I know this came up recently in our NFJP inbox. And we can – (inaudible) – in you. And we had talked about sometimes even though – if they were let go with a cause or terminated with a cause, then in some cases working with the state monitor advocate, the state monitor advocate is able somehow to convince the employer. Like, this person's going to be stranded here. Is there something that you could do? So I think it's worth revisiting and having that conversation with the employer.

I know that we are concerned if – and that's why I thought I'd clear it yesterday. Like, yes, you can provide emergency assistance. But as far as that scenario that we received if somebody was terminated with cause and then wanted to just have a ticket to go to another state and not home, that just flagged questions for us as well. I think you did a great job answering that, Laura. And if there's any specific detail that you may have – and I know this question came from Martha – feel free to follow up with us via email nfjp@dol.gov and copy your FPO.

I appreciate all of you for hanging on. It's been such a pleasure to have you all online. I know that you've reached your goals – (inaudible) – important participant that registered. It seems like all of you did dial on. We still have about 139. We look forward to continuing the conversation. We know that this is definitely maybe not the best format to have participant eligibility, but we're doing our best. And we are definitely going to continue to provide technical assistance around this topic. Laura, do you want to say anything else?

MS. TRAMONTANA: That does it for me. I appreciate everybody joining. Thank you for your questions. And one of the take-homes that we have, I think, with these questions and one of the last questions too, is there's always going to be unique situations. And that's where really reaching out to your FPO and to us at the national office is going to come into play, because we can't anticipate everything. But we will respond to them and provide clear guidance when we get the specific questions. So thank you again for joining.

MS. TRAMONTANA: Thank you. And thank you for the feedback.

MR. VEHLOW: All right.

(END)