Establishing Policies for Participant Employee Success

Economic Mobility – Optimizing Program Design

Do you have an online or hard copy place in which your organization’s policies relating to participant employees are documented and readily available to staff ?

Yes

No

Sort of: (please explain briefly)

Program Announcement: Optional Technical Assistance

As a reminder, you can continue to access Technical Assistance through CA RISE. Below are opportunities for additional support beyond the 1:1 project you can access through your RM.

Listen4Good

We are offering Listen4Good's Premium Program in Jul 2025 which includes:

- Survey templates for surveying community members, clients, volunteers, staff, and partners
- 1:1 coaching from experts in survey design, increasing response rates, and data analysis
- SurveyMonkey Premier account
- Client survey benchmarks– comparing your survey results to similar organizations
- Step-by-step webinars and a core web app with templates, resources, and FAQs

If interested, please email Galiana at galiana@redf.org

NorthStar Digital Literacy

We are offering a one-year subscription to NorthStar's Digital Literacy Curriculum, which will enable your participant employees to access tools that support:

- Mastering the basic skills needed to use a computer
- The internet in daily life, employment, and education.

This opportunity also includes three 90-minute training flights designed for someone on your staff who is/will be responsible for digital literacy education.

If interested, please email Galiana at galiana@redf.org

CFR Direct Deposit

We are offering support with direct deposit to your participant employees through CFR focus cards.

Direct deposit is the fastest, safest, and most reliable way to pay employees—and a powerful step toward financial security.

If interested, please email Galiana at galiana@redf.org

Program Announcement: Upcoming Optional Workshops

We will continue to release optional content including workshops that you can attend! We want to gauge interest in the August Sessions as they require a significant time commitment

May 2025

May 6 – 8: Advancing Financials Series

- **May 6:** Double Bottom Line Analysis
- **May 7:** Raising Impact Capital Strategy
- **May 8:** Embedding Data & Finance in your Decision-Making – TBD

June & July 2025

June 3- 17: Executive Skills and Career Readiness Series

- **June 3:** Executive Skills
- **June 4:** Lived Experience and Career Readiness
- **June 5:** Career Readiness Curriculum Deep Dive
- **June 17:** The Case for Embedding Executive Skills into your Organization
- **July 1:** Leveraging Implementation Science to become an Executive Skills Focused Organization

July 10: Addressing Burnout – The Science of Optimizing Productivity & Performance

August 2025

Gauging Interest - We can offer the Management Center's Training on Effective Management, which provides tools and resources on how to drive impact, strengthen culture, delegate projects and responsibilities effectively (without micromanaging), address unconscious bias, build strong manager-staff relationships, and use feedback to manage performance and improve results. Minimum time commitment 6 hours.

If interested, please email Katie at korovecz@redf.org

Economic Mobility Optimize Program Design

1 — **August 2024:** Tailoring your Success Program to your Focus Population

2 — **October 16th 2024:** Developing and Improving your Logic Model

3 — **December 11th 2024:** Designing a Quality Participant Employee Experience

4 — **February 12 2025:** Building the Infrastructure: Staffing and Partnerships

5 — **April 16 2025:** Establishing Policies for Participant Employee Success

6 — **June 11 2025:** Participant Employee Information Tracking Tools

◆ **Optional Coaching Sessions**

Our goals for today and plan to achieve them

OBJECTIVES

- Build peer connections
- Gain awareness of topics that ESEs have found it helpful to have policies addressing, relevant considerations, and recommendations
- Prioritize policies that your ESE should adopt or change in the near term and begin thinking about factors specific to your context
- Identify opportunities for consistently communicating your ESE's policies
- Create space for raising questions, but be comfortable with not being able to resolve all questions today

AGENDA

- Context and rationale for establishing policies
- Key policies for participant employee success
  - Personal reflection
  - Small group discussions
- Key practices for participant employee success
  - Small group discussions
- Communicating policies and practices to staff and participant employees
- Wrap Up
  - Individual commitments

Today's punchline

Clear, documented policies empower ESE staff to act quickly, strategically, and with consistency when issues arise, fostering fair and equitable responses.

Policies in context

Balancing ESE's mission
with risk mitigation

Commitment to supporting individual employees

- Distinguishes ESEs from other employers
- Takes into consideration circumstances of employee
- Developmental approach: Not expecting performance to be at 100% on day 1…but expecting to see improvement over time
  - Consequences (discipline and punishment) vary at different stages

Risk mitigation / compliance with employment laws

- Nonprofits can potentially be sued for discrimination
  - E.g., perception can be enough to spark such charges, so need to be wary of treating your employees differently from one another
  - Equity is a key value of many ESEs – but employment law still tends to prioritize equality

Put in writing the scenarios that may result in different treatment

- Nonprofits are regularly sued for violation of wage and labor laws
  - Private Attorneys General Act (PAGA)
    - https://redfworkshop.org/resource/paga-private-attorneys-general-act-compliance-webinar/

Private Attorneys General Act (PAGA): Recent Reforms

- Recent reforms
  - Requires a PAGA plaintiff to have **personally suffered** each of the Labor Code violations
  - Expands "cure provisions"
  - Reduces penalties for employers who proactively take "all reasonable steps" to comply with the Labor Code

- High-risk labor code violations
  - Failure to provide meal and rest periods as required
  - Failure to provide complete and accurate wages statements to employees
  - Failure to keep accurate time records (need to ensure employees are not working off the clock)
  - Failure to reimburse business-related expenses and costs
  - Failure to pay employees in timely manner
  - Unlawful wage deductions

Use of personal cell phones; uniform purchase or maintenance

Key policies for participant employee success

1) Duration of employment
2) Eligibility for:
   - Employee benefits
   - Program benefits
3) Compensation
4) Information sharing / privacy
5) Re-hiring
6) Substance use

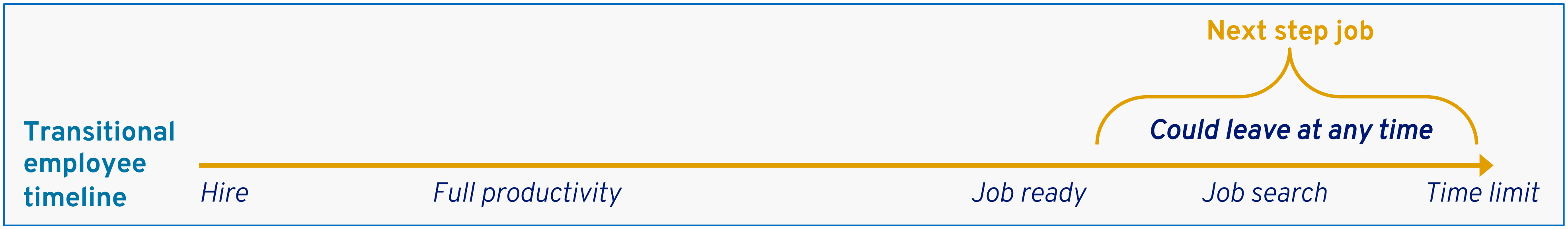
Duration of employment

Definition: Policy setting a time limit capping the length of a transitional job

Promising Practices	• Offer consistent, frequent communication about time limit, from recruitment onward • Help employees anticipate transition. Shift service mix as time limit nears. Offer use of onsite computers and a few hours of paid time for job search. • Celebrate transitions • If you want to retain a participant employee for the ESE's benefit, promote them to a permanent role
Mistakes to Avoid	• Saying that you are a transitional employer but not enforcing time limits. Unless they consistently see other employees leaving, participant employees will not believe that policy applies to them. – E.g., an ESE says it is a transitional employer, but the only employees who ever leave are those who are fired (including no call/no shows) • Without a policy specifying the duration of transitional employment, most employees will prefer to remain at the ESE and believe that they will be able to do so…and won't take job search seriously • Don't make exceptions to time limits for your best/most valued employees that result in "holding them back" from better opportunities elsewhere

Duration of employment (continued)

Not just a time limit: ESEs should really be identifying a several weeks- or month-long range when supportive of transition



- Considerations in setting a time limit:
  - Trade-offs: Longer duration means fewer opportunities that an ESE can open for additional job seekers with barriers
  - How long does it take for new hires to get up to full productivity? How long does your business want someone to be working at full productivity in their role prior to transition / promotion?
  - How long does it take to impart programming? How long does it usually take for your participant employees to become more stable?
  - How disruptive is turnover to your business? Would it be less disruptive if predictable / planned?
  - What is your experience around how long employees need for job search prior to securing a good-fit job?

Duration of employment (continued)

Permanent employers also have decisions to make

- Is your culture going to be one where:
  - Your aim is to retain your participant employees, and you invest in them accordingly
  - You are only "technically" a permanent employer, but still proactively encourage transition:
    - You are still providing career navigation services and investing in skill-building opportunities regardless of relevance for a job within the ESE
- Hybrid option:
  - Can set and consistently communicate a time limit, but then have a policy of extending for specified reasons, for example:
    - Employee's interest – Employee is demonstrating effort but taking longer to progress. Equity may suggest extending for a few months.
    - ESE's interest – Employee is filling a role that would be hard to fill otherwise. Retain them for a fixed period of time but increase pay to make it competitive with what they would earn elsewhere.

Employee benefits: Differences need to be based on employment-based classifications

Definition: Policy outlining benefits for participant employees. Employers can treat employees differently from one another (e.g., offer different benefit packages) only if the employer can demonstrate that the individuals fall into different bona fide employment-based classifications. "Similarly situated individuals" must be treated equally.

- Employment-based classifications can be based on factors like hours worked per week, employment duration, tenure with the enterprise, nature of responsibilities (e.g., full-time / part-time, temporary / permanent, nonexempt / exempt)

Promising Practices or Considerations	• Decide what and how many factors to use to distinguish between categories of employees • Ensure you are up to date on benefits mandated by California or your locality and that these are included for all eligible employees • Permanent employers or ESEs employing employees for longer durations should consider providing benefits to increase employee stability and job quality • Consider extending benefits of little cost to the enterprise to all employees (e.g., EAP) • Acknowledge / celebrate when an employee becomes eligible for benefits (it's essentially a raise even if not usually perceived that way) • Clarify that participant employees qualify for benefits (even though they aren't traditional ones) and detail what these are (e.g., tutoring, savings match, food pantry / clothes closet)

Employee benefits (continued)

Mistakes to Avoid

- Failing to include classification in a job description. Needs to be clear to employees what category their job is in and what they are eligible for.
- Failing to communicate eligibility for state- or locally-mandated benefits available to all employees
- Failing to detail categories in an employee handbook

ESE Examples

- Most transitional ESE employees are temporary, nonexempt. More variation in whether full-time or part-time.
- Although most ESEs reserve insurance and retirement benefits to permanent employees, some that offer longer-term transitional jobs (9 months – 2 years), begin offering after benchmark passes (e.g., 3 months). Less common, but some ESEs extend same benefits to participant employees as professional staff.

Eligibility for program benefits

Definition: Policy outlining consistent eligibility standards for the supports and resources designed to stabilize your participant employees and support their professional development. Examples include emergency payments / advances / loans, private sessions with external professional (e.g., driving instructor, therapist), savings match.

Considerations	• Whether to prioritize those participant employees who have already demonstrated commitment, or to extend eligibility to newer participant employees who may need the support to achieve stability sufficient to maintain participation.
Mistakes to Avoid	• Failure to communicate consistently with participant employees about the availability and prerequisites / eligibility requirements • Providing staff so much discretion around when, for whom, and how to implement that: – There is an appearance of favoritism or discrimination – Participant employees who need aren't accessing
ESE Examples	• Up to $1,500 for barrier removal; eligible after 500 work hours with good attendance record • 1:1 savings match up to $500; eligible after 3 months

Reflection

Consider the policies that we've discussed so far:

1) Duration of employment
2) Eligibility for:
   - Employee benefits
   - Program benefits

Open your reflection sheet and evaluate where your ESE is today with regard to each policy:

1) Got a policy we really like
2) Have something, but would be good to update / refine
3) Don't have much of a policy, or it's not working

Compensation

Definition: Policy clarifying whether participant employees are "on-the-clock" earning wages for any portion of programming time (i.e., is programming part of their job)

Considerations	• What form of payment (e.g., wage, stipends, gift cards) aligns best with organizational goals? Supports employee stability and success? • When employees are on the clock, you can mandate their attendance • Does paying someone for program time push them over the eligibility trigger for a benefit that the ESE can't yet afford to pay?
Promising Practices	• Be clear about exactly what is included. For example, some ESEs include: – Paid time for one-on-one meetings with Employee Success Specialist – Up to two hours a week of paid time for job search during final month of employment – Paid time for workshops or tutoring that take place during standard work hours – An hour a week for "barrier removal activities" • If you have some but not enough resources to pay participants, use funds to get them "through the door." – For example, pay for the first hour of a two-hour workshop or pay them for the first two sessions of therapy, trusting they will find sufficient value to stay. Or pay for sessions that require travel to a different site but not for those happening onsite immediately before / after a work shift.

Compensation (continued)

Mistakes to Avoid	- Cannot discipline someone at work for not doing something that they were not paid to do - When programming is part of “work” or participants are ”producing” product or service to be sold, then wage and hours laws need to be followed

Information sharing / privacy

Definition: Policy clarifying professional staff members' access to information about participant employees

- Risk is that access to personal information may make a supervisor unintentionally treat participant employees differently

Promising Practices	• Only program staff have access to such information • Supervision / Business staff convey observations; Program staff ask "why"
Mistakes to Avoid	• All staff members have access to everything • Two-way information sharing between Employee Success staff and Supervisors • Trying to be helpful, supervisors convey out-of-date information about community and public resources to participant employees • Supervisors privy to personal information treat employees differently, raising questions about fairness
ESE Examples	• Supervisor and Employee Success Specialist do first portion of performance review or JRA together, but then Supervisor leaves room and ESS and participant employee troubleshoot challenges in home life that may be affecting performance / attendance • Different staff members have access to different parts of the CRM system

Re-hiring

Definition: Policy specifying whether or not the ESE will re-hire a former participant employee. Can refer to any of the following:

- Transitional employer hiring graduates as permanent staff
- When short-handed, temporarily bringing back graduates who have not secured external employment or who have lost a job
- Re-hiring as a participant employee somebody who did not previously graduate

Promising Practices	• Hiring graduates only after they have spent a defined amount of time working elsewhere • Requiring graduates applying for hire to go through a formal application and interview process. Okay to be explicit that you are prioritizing for hire those who have past experience with the ESE and its programming. • Requiring that graduates hired to fill in temporarily are also still actively job searching (and receiving staff support in re-employment efforts) • Rehiring individuals who did not previously graduate only after they can explain what will be different this time around. Requiring them to go through program in its entirety (unless extenuating circumstance, such as having left for a medical issue)
Mistakes to Avoid	• Unintentionally messaging to an individual or to other participant employees that time limits should not be taken seriously

Substance use

Definition: Policy specifying how the Enterprise handles substance use, including testing, treatment, and discipline

Considerations	• "Suspicionless" drug testing permitted as a condition of employment after a job offer is made but prior to the employee beginning work • Employers cannot penalize employees for use of cannabis outside of work • Random drug testing is not permitted • Drug testing is permitted if there is reasonable suspicion of impairment, and workers compensation often requires after an accident • If you have 25 or more employees, you must reasonably accommodate any employee who volunteers to enter an alcohol or drug rehabilitation program, provided the reasonable accommodation does not impose an undue hardship on your business
Promising Practices	• Creating an environment where employees know that they will receive support, not discipline, for sharing information about use / relapse
Mistakes to Avoid	• Not keeping up with rapidly changing laws • Disciplining employees for communicating about drug use versus impairment on the job • Treating different employees differently

Reflection

Consider the policies that we've just discussed :

1) Compensation
2) Re-hiring
3) Substance use

Return to your reflection sheet and evaluate where your ESE is today with regard to each policy:

1) Got a policy we really like
2) Have something that's ok but could be updated / refined
3) Don't have much of a policy, or it's not working

Breakout #1

Break into small groups and discuss some of the policies that you reflected upon:

- Share an example of a related policy or practice that's working well for your ESE?
- What is a policy that you think you should add, refine or change based on something said today?

Key practices for participant employee success

1) Attendance
2) Performance management
3) Discipline
4) Employee input / voice / feedback

Attendance

<u>Definition</u>: Outlining your ESE's expectations pertaining to employee attendance, timeliness, absences, and other related matters and the ways you hold employees accountable to these standards.

Considerations	• When and how you prefer to be notified of an absence or late arrival • Whether your expectations and disciplinary measures vary dependent on: – Duration of participant employees' employment – Whether for work shift or programmatic activity • Whether to use a traditional or points system
Promising Practices	• Policy includes: – Overview of attendance expectations – Time off requests and communication process – Policy expectations on specific leaves – Disciplinary actions • Share info about missed days or tardiness with program staff immediately
Mistakes to Avoid	• Treating all absences the same, regardless of reason • Failure to communicate employees' rights relative to time off (e.g., mandated paid leave, FMLA, California Family Rights Act, ADA, jury duty) • Penalizing employees for absences protected by law • Poorly crafted point systems that encourage abuse

Attendance policies

Point System Attendance Policies

Pros:

- Objectivity
- Transparency
- Motivation

Cons:

- Potential for failure to distinguish between absences protected by law and those that are not
- Potential for abuse by employees
- Rigidity
- Does not necessarily spur dialogue

Non-Point System / Traditional Attendance Policies

Pros:

- Flexibility
- Dialogue may help identify and address root cause
- Lower administrative burden

Cons:

- Subjectivity
- Lack of clarity and transparency
- Difficulty enforcing

Performance management

Definition: The process of continuous communication and feedback between a manager and employee towards the achievement of organizational objectives which, in an ESE, include both business goals and employee readiness for competitive employment

Considerations	• Frequency of feedback • Format of feedback • Roles

Promising Practices	• Use of the REDF Job Readiness Assessment (JRA), contextualized for your ESE, a minimum of three times prior to transition • Peer mentors providing continuous feedback

Performance management (continued)

Example: Implementing the Job Readiness Assessment

Determine Criteria and Timing →	Soft / Hard Skills Feedback →	Personal Readiness Checklist →	Document Scores →	Prompt Next Steps
Managers should decide evaluation criteria, timing, and due dates for JRAs.	The supervisor fills out Soft and Hard Skill secion of JRA and submits it to designated manager. Following, they should conduct a feedback meeting with the worker, possibly adding their case manager to the discussion.	The case manager evaluates the worker on the personal readiness criteria. Then they should conduct a feedback meeting with the worker to discuss their personal readiness and barriers. Supervisors should not be in attendance at this meeting.	After each JRA, the case manager should collect the assessment and total score for each worker. Then the scores and JRA should be uploaded to the organization's data management system in a way that is easy for case managers and job developers to view.	Scores should prompt a plan for next steps before the worker's next JRA or transition from the program. If they pass the JRA 2 times then they are considered "job ready" and eligible for job developer assistance.

Discipline

Definition: An ESE's process for enforcing its rules and standards of behavior. The goal is to correct behavior, prevent future violations, maintain a productive workplace, and support employees' progress toward readiness for mainstream employment.

Considerations	• Your organization's expectations of and standards for participant employees (may differ by phase, may differ by context) – Clarify areas in which your ESE has zero tolerance (i.e., behaviors that trigger immediate pause or termination versus progressive discipline) – When job-related discipline has programmatic repercussions • Staff roles
Promising Practices	• Address behavior / issue immediately or same day • Progressive discipline. Have a detailed plan. • Approach with a trauma-informed lens • Keep it private – have disciplinary conversations in private spaces; do not share information about disciplinary status with other participant employees • Consistent enforcement • Communicate the impact that behavior has on the team / workplace / organization as a whole

Discipline (continued)

Example: Plan for addressing performance issues as they occur

PERFORMANCE MANAGEMENT				
Incident	Incident Description	Required Action	Responsible	Involved
Not meeting production goals	• Participant is not meeting production goals • Address issue after 3 weeks of poor or decreased performance	1. Observe the work to identify room for improvement	Supervisor Trainer or Job Coach	
		2. If "quick-fix" or skill issue - conduct a check-in to address issue/provide support	Supervisor Trainer or Job Coach	
		3. If recurring/related to violation of another policy – hold program team meeting	Supervisor Trainer or Job Coach	Program Director & remainder of program team
		4. Document instance in participant's Slack	Supervisor Trainer or Job Coach	
Underperformance in soft / hard skills development	• Participant is not demonstrating necessary growth in soft / hard skills areas	1. Observe / document issues	Supervisor Trainer or Job Coach	
		2. Discuss room for growth in performance review	Supervisor Trainer or Job Coach	
		3. Provide / additional training and support, as needed	Supervisor Trainer or Job Coach	
		4. If no improvement, set meeting with Program Director & Supervisor Trainer or Production Manager	Job Coach	Program Director & Supervisor Trainer or Production Manager, where applicable

Source: Extract from Mile High Works Performance Management and Discipline

Employee input / voice / feedback

Definition: Refers to the formal process of gathering and responding to feedback from participant employees, with an emphasis on equity, ease of use for decision-making, review by leadership, and continuous improvement

Considerations	• Willingness to use learnings to inform changes; gaining upfront buy-in from staff • When and how frequently to gather feedback (programmatic stage or specified cadence) • Methods most likely to be effective and accessible with your participant employees • Staff roles

Promising Practices	• Gathering employee voice
	– **Design** methods and tools to gather feedback
	– **Collect** participant employee feedback via selected methodology (e.g., survey or interview)
	– **Interpret** data collected and distill insights and takeaways
	    – Highlight areas for celebration as well as areas for improvement
	    – Look specifically for any differing experiences and feedback from historically marginalized groups
	– **Respond** to the feedback as appropriate (e.g., program changes, behavior shifts, policy revisions)
	– **Close the loop** by sharing back what was learned and the ways you're responding to the feedback

Source: Listen4Good

Employee input / voice / feedback (continued)

Mistakes to Avoid	• Failing to gather feedback / input; assuming you already know what participant employees think/experience • Failure to assure anonymity • Gathering feedback but not sharing results with the employees who provided it • Failing to close the loop and share results and use of feedback • Survey fatigue

Resources:

- REDFworkshop Article
- Customizable template for a participant employee survey

Breakout #2

Choose which breakout group you would like to join:

1) Attendance
2) Discipline
3) Employee input/voice/feedback

In your breakout group, discuss:

1) What practices and/or tools are you using? What is working well?
2) What is an ongoing challenge for you?

Documenting and communicating policies

1) Staff

2) Participant employees

Communicating policies and practices to professional staff

- Staff-facing policy and procedure manual
- Discuss case studies during onboarding and team meetings to ensure consistent interpretation and application
  - Capture examples for subsequent use
- Review and update
  - As realize additional detail or new policies needed
  - Updates / changes
  - Do continuously but also set cadence for review in entirety

Communicating policies and practices to participant employees

- Frequent and multiple forms of communication
  - Recruitment materials / info sessions
  - Orientation / onboarding
  - Meetings / huddles
- Tailoring handbook(s) to participant employees
  - Consider coupling employee handbook with a program handbook
  - Employee-friendly cover sheets and one-pager supplements to formal handbook
  - Voiceover handbook contents as few participant employees will read
    - Be creative: role play, videos, etc.
  - Clarify importance to employee and ESE of compliance around lunch / breaks / clocking in and out, etc.
- Check-ins and reviews

Reflection

Share in the chat policies or practices that you are intrigued by or that you would like to explore further during the coaching session

Key resources to be posted

- Job Readiness Assessment article and tool
- Participant Employee Compensation Best Practices
- The Mile High Way: Performance Management and Discipline
- PAGA compliance webinar
- Participant Employee Voice article
- Customizable template for a participant employee survey and a sample survey
- REDF Workshop article: Participant Employee Handbook

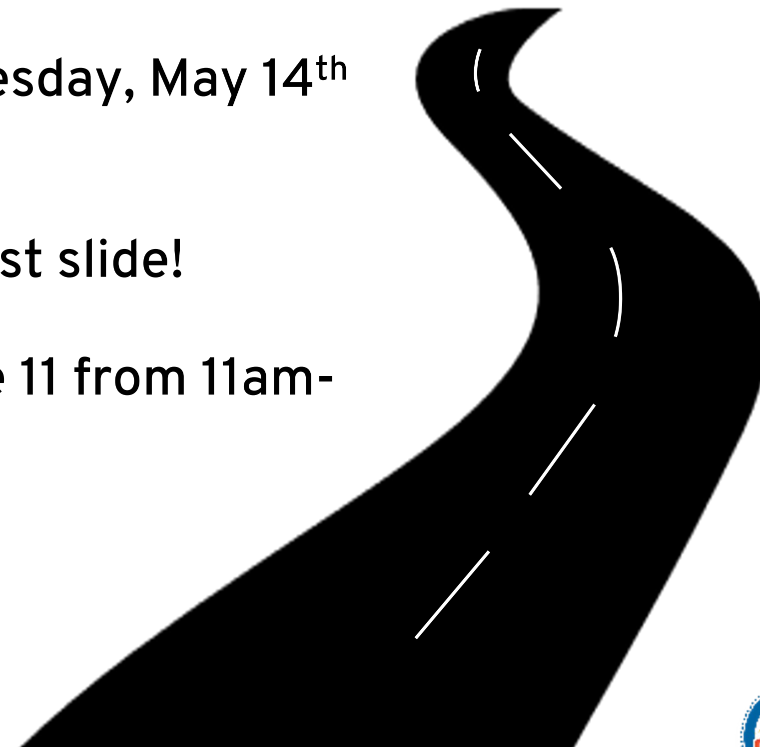
Commitments

Based on everything you learned today, what are one or two commitments you can make? For example:

- Review your ESE’s existing handbooks or other policy documentation
- Convene colleagues to discuss which policies / practices to revisit or add
- Assign team member to watch PAGA webinar to learn more about CA labor law

What's next?

- Additional resources will be posted on REDFWorkshop
- Coaching hours will be hosted on Wednesday, May 14th from 11am-12:30pm PST
- Make progress on commitments from last slide!
- Next cohort session is Wednesday, June 11 from 11am-12:30pm PST
- Upcoming optional workshops:
  - May 6 - Double Bottom Line Analysis
  - May 7 - Rising Impact Capital Strategy



Feedback survey

Please take a few minutes to fill out our Survey on this session.

https://bit.ly/EMTOptimizeAll

This feedback helps us improve your experience and plan adjustments to make moving forward.

Thank you!