

Implementation Date: Month XX, 2016 Scheduled Review Date: Month 2017 Responsibility: Arapahoe/Douglas Workforce Development Board	Subject: WIOA Classroom Training Policy		Policy Number: ADWB-04-2016, Change 2
	Summary: To establish parameters for the approval of ITAs for WIOA participants		
	Scope: All Arapahoe/Douglas Works! Employees		
Category(ies):	Workforce Innovation and Opportunity Act	Revises	ADWB-04-2016

The Arapahoe/Douglas Workforce Board has designated Arapahoe/Douglas Works! as the one-stop operator, and thereby the facilitator of the following approved policy and associated language contained herein.

ALL REVISIONS ARE HIGHLIGHTED IN YELLOW

ALL MARCH 2016 REVISIONS ARE HIGHLIGHTED IN GREEN

ALL OCTOBER 2016 REVISIONS ARE HIGHLIGHTED IN BLUE

Citations:

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Sections 108 and 134 (c)(3) Use of funds For Employment and Training Activities;
- WIOA Department of Labor-Only Final Rule (81 FR 56072, Aug. 19, 2016).
- Veterans’ Program Letter (VPL) 07-09, Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor.
- PGL WIOA-2015-09 (prior #15-15-WIOA), Individual Training Accounts for WIOA Title I Adult and Dislocated Worker Programs

Background:

The Workforce Innovation and Opportunity Act (WIOA) requires that training services are provided to eligible Title I Adults and Dislocated Workers, in most cases, through use of the Eligible Training Provider List (ETPL) and Individual Training Accounts (ITAs). The intent is to maximize informed customer choice in the selection of qualified training providers. A participant in a Title I formula program, who is seeking specific types of training services, must select an eligible provider of training services from the ETPL, in consultation with a Workforce Specialist (WFS). Once selected, the WFS is expected to arrange for payment of services through an ITA. Use of the ETPL and ITAs is required for classroom training, with limited exceptions (Sec. 134(c)(3)(G)), and may include apprenticeship training or other training options. The ETPL and ITAs may also be used as appropriate for out-of-school young adults, ages 16-24, utilizing WIOA Title I Youth program funds.

Under Title I of WIOA, training services must be provided in a manner that maximizes informed customer choice in selecting an eligible provider. The Workforce Development Board (WDB), through Arapahoe/Douglas Works! (ADW!), will make the ETPL available to customers. The one-stop delivery system will refer the individual to training and coordinate payment with the eligible training provider through an ITA. The ITA is a payment agreement established on behalf of a participant with a training provider. Only those training providers that are on the State’s ETPL, and are approved for use of WIOA funding, are able to redeem ITAs for payment.

This policy establishes a framework and procedures for the placement of program participants in training services following receipt of one or more career services. It covers ITAs, issuance

of training vouchers, training providers, pre-requisites to training, allowable expenditures and other pertinent issues. It is the intent of this policy to establish a clear focus for our classroom training effort. This policy will also be utilized in coordination with the WIOA Priority of Service for Title I Adult Programs' policy procedures to ensure that priority of service is given to program participants that qualify under the four (4) priority groups, in addition to the local discretionary priority, as defined in PGL WIOA-2015-07: Priority of Service for Title I Adult programs.

Action Adult/Dislocated Worker:

Training Amounts/Caps

Following various criteria (i.e., data analysis of employment concentrations and significant economic impact), the ADWB has determined the following in-demand industry sectors: Aerospace, Aviation, Bioscience, Broadband, Construction, Engineering, Finance, Healthcare, Hospitality, Manufacturing, and Information Technology. Training in ADW!'s Regional Targeted Academy may not exceed \$6,000.00 for Tuition and training required Books/Supplies per program life. Training assistance may include stackable credentials that are identified as a career pathway and will result in the participant acquiring industry recognized certificates. Classroom training assistance may be offered in conjunction with work-based learning opportunities to participants who are in ADW!'s Regional Targeted Industries, but may not exceed the maximum amount of \$6,000.00 as established by the ADWB.

The ITA approved for the participants requesting training dollars outside of ADW!'s Regional Targeted Industries may not exceed \$3,000.00 for Tuition and training required Books/Supplies per program life. Training assistance may include stackable credentials that are identified as a career pathway and will result in the participant acquiring industry recognized certificates. Classroom training assistance may be offered in conjunction with work-based learning opportunities to participants who are not in ADW!'s Regional Targeted Industries, but may not exceed the maximum amount of \$3,000.00 as established by the ADWB.

Participants who have previously received training and/or have reached their cap limit may be eligible for additional training assistance with the approval of the Talent Development Manager. Any Training Request Packet (TRP) approved on or after August 7, 2014 by the TRP Committee will be subject to these caps.

Training caps are max allowable costs for potential trainings, but they are not guaranteed amounts for individuals requesting training assistance. If, for example, a participant has been approved for Regional Targeted Academy classroom training and has expended less than the maximum of \$6,000.00, he/she could utilize the remaining balance (unused funds) for additional classroom training and/or work-based learning activities in alignment with their career pathway, if appropriate.

Training caps apply to all CDLE funding resources for training services (i.e., BS, PV, OC, WE, AC, and OJ) that are allocated to ADW!. Participants in training are not allowed to receive funding from multiple funding sources in excess of the max allowable training cap designated for the participant's training.

Restrictions

Individuals requesting WIOA training resources to include ITAs and work-based learning opportunities are not eligible for WIOA training resources if they have previously received WIOA training funding from any workforce center in the state of Colorado within the past 5 years. These participants may still receive intensive employment services through WIOA. Exceptions to this policy will be considered on a case-by-case basis and requires approval from the Talent

Development Manager.

Individuals who do not successfully complete any WIOA funded program, and/or do not demonstrate follow-through, will not be eligible for future WIOA services. Exceptions to this policy will be considered on a case-by-case basis and requires approval from the Talent Development Manager.

Requirements

All training requests need ADW! WIOA TRP Committee approval prior to issuance of funds. Any training costs incurred prior to enrollment in the WIOA program along with completion of the TRP and ADW! WIOA TRP Committee approval will not be paid for by WIOA funds. For semester based training programs, enrollment in the WIOA program along with completion of the TRP and ADW! WIOA TRP Committee approval of the training request must be completed prior to the beginning of the semester and prior to funds being allocated.

The establishment of an ITA and issuance of a Training Authorization Voucher (TA) requires that a participant complete an Occupational Research Activity/TRP. The ADW! WIOA TRP Committee will review each TRP and consider current and projected labor market Information for final training approval. The ITA may be established for the full amount approved up to the maximum noted above. The WFS should issue training vouchers based upon satisfactory performance and attendance while in the program. Once the ITA has been approved, the voucher may be issued directly by the WFS, as long as the Training Provider and the specific program selected by the participant are on the approved State Provider List.

All vouchers submitted for approval require supporting documentation to verify the cost incurred by the participant. Supporting documentation from the training/books and supplies vendor will be detailed in Classroom Training Policy Guidelines. Any supporting documentation used to request ITA funds, books, and/or supplies that are not addressed within Classroom Training Policy Guidelines requires approval from one of the following persons: WIOA Program Supervisors, Talent Development Manager, or ADW! Deputy Division Manager.

Action Young Adult:

Training Amounts/Caps

Following various criteria (i.e., data analysis of employment concentrations and significant economic impact), the WDB has determined the following in-demand industry sectors: Aerospace, Aviation, Bioscience, Broadband, **Construction**, Finance, Healthcare, Hospitality, **Manufacturing**, and Information Technology. Training in ADW!'s Regional Targeted Academy may not exceed \$6,000.00 for Tuition and training required Books/Supplies per program life. **Training assistance may include stackable credentials that are identified as a career pathway and will result in the participant acquiring industry recognized certificates.** Classroom training assistance may be offered in conjunction with **work-based learning** opportunities to participants who are in ADW!'s Regional Targeted Industries, but may not exceed the maximum amount of \$6,000.00 as established by the ADWB.

The ITA approved for the participants requesting training dollars outside of ADW!'s Regional Targeted Academy Industries may not exceed \$3,000.00 for Tuition and training required Books/Supplies per program life. **Training assistance may include stackable credentials that are identified as a career pathway and will result in the participant acquiring industry recognized certificates.** Classroom training assistance will may be offered in conjunction with **work-based learning** opportunities to participants who are not in ADW!'s Regional Targeted Academy Industries, but may not exceed the maximum amount of \$3,000.00 as established by the ADWB.

ADW! will allow young adults who are involved in any Industry Academy to receive a one-time stipend payment of \$250.00 when attached to other certificates exclusive of the \$3,000.00 and \$6,000.00 training limit. Young Adult participants completing the academy may be paid the stipend with appropriate documentation.

Training caps are max allowable costs for potential trainings, but they are not guaranteed amounts for individuals requesting training assistance. Training caps are max allowable costs for potential trainings, but they are not guaranteed amounts for individuals requesting training assistance. If, for example, a participant has been approved for Regional Targeted Academy classroom training and has expended less than the maximum of \$6,000.00, he/she could utilize the remaining balance (unused funds) for additional classroom training and/or work-based learning activities, if appropriate.

Training caps apply to all CDLE funding resources for training services (i.e., PV, BS, OC, WE, AC, and OJ). Participants that have received one or more of the above training services in another region or through ADW! in the past 5 years can receive additional training funds from ADW! if deemed appropriate on a case-by-case basis staffed by the WIOA Leadership Team. ADW! will apply previous training funding received toward the identified training caps of \$3,000.00 (Non-Regional Targeted Academy) or \$6,000.00 (Regional Targeted Academy).

ADW! will assess re-entry into the WIOA Young Adult program on an as needed basis for young adults who have been exited from the program due to a 90 day gap in services, but who may still benefit from intensive service delivery or intensive training activities. Young adults will be determined eligible for re-entry based on the following criteria:

1. The young adult participant was termed neutral or positive from the WIOA Young Adult program and will be continuing his/her education in a Regional Targeted Academy.
2. The young adult participant did not receive training funding towards a post-secondary program or received minimal training funding and can benefit from additional

- assistance to fund continuing education.
3. A young adult who was enrolled as an in-school Young Adult, but needs post-secondary training assistance as an out-of-school Young Adult.
 4. Any other reason deemed as necessary to provide intensive training activities to increase young adult employment may be granted by an ADW! Talent Development Manager and/or ADW! Deputy Division Manager.

Requirements

Individuals requesting training funds must have participated in one or more career services prior to receiving training assistance. All training requests need ADW! WIOA TRP Committee approval prior to issuance of funds. Any training costs incurred prior to enrollment in the WIOA program along with completion of the TRP and ADW! WIOA TRP Committee approval of the training request will not be paid for by WIOA funds. For semester based training programs, enrollment in the WIOA program along with completion of the TRP and ADW! WIOA TRP Committee approval of the training request must be completed prior to the beginning of the semester and prior to funds being allocated.

For Young Adult participants, the establishment of an ITA and issuance of a Training Authorization Voucher (TA) requires that a participant complete one or more career services prior to receiving training assistance. After satisfying this pre-requisite, the participant must complete a TRP. The ADW! WIOA TRP Committee will review each TRP and consider current and projected labor market Information for final training approval.

The Young Adult ITA may be established for the full amount approved, up to the maximum noted above. A WFS is allowed to issue training vouchers based upon satisfactory performance and attendance while in the program. Once the ITA has been approved, the voucher may be issued directly, as long as the Training Provider and the specific program selected by the customer are on the approved State Provider List and/or on the Procurement List.

Any exceptions to this process must be documented with rationale and signed off by a member of the WIOA Leadership Team.

Participants who apply for an ITA will be encouraged to apply for FAFSA to supplement any living expense they may have while in training. Regardless of Pell eligibility, participants who complete the TRP requirements and follow through with the program requirements will receive tuition assistance as noted above. Young Adult incentives allowable under training are as follows:

Activity	Incentive Amount
High School Diploma/GED Attainment	\$200 for completion
Post-Secondary Education*	\$250 for completion of credential/training
Academy	\$250 for completion of academy
Work-Based Learning Activity (Unpaid)	\$250 for completion

Action All WIOA programs:

- ADW! employees are not eligible for any ADW! WIOA Training ITA Dollars.
- ADW! employees Relatives are not eligible for any ADW! Training ITA Dollars. Relatives are defined below:
 - Parents, Spouses, Children, Cousins, Grandparents, Siblings, Nephews, Nieces, Aunts, Uncles, In-laws.

All customers in this category will be referred to other outlying counties for WIOA Services. Any ADW! employee's relative enrolled prior to July 1, 2008 will adhere to Policy #2008-12 for services.

The above funding limitations do not apply to supportive service as noted in ADW!'s supportive service policy. Participants must maintain a minimum of a 2.0 GPA (or equivalent) to continue to receive ADW! training assistance. If participants fall below this or fail one or more courses they will be placed on probation until the next grading period is completed. If participants fail to bring their GPA up during the probationary period, they will not be eligible for further funding through the WIOA programming. WIOA participants that are enrolled in a short term training program leading to a certificate, who fail the training, will not be eligible to receive funding and/or further training through WIOA, including when ADW! receives reimbursement from the training provider.

Participants that have completed training and are approved for WIOA services to pay for a state licensure will receive funding for up to two attempts through WIOA to receive their licensure. Participants who fail to complete their training program within the allotted time given by the training provider will not be eligible for further training and/or training with other training providers (this will include any training related services). Participants requesting licensure payment assistance with completing training are required to complete a modified TRP.

Any training extensions must be requested in writing by the customer and approved by the training request committee and only one extension may be granted by the training request committee per customer. WFS are required to obtain progress reports/grades each semester, or after completion of certificate for short term trainings, from the participant for further funding through the WIOA programming.

Basic skills development, including academic, keyboard, computer, problem-solving, teamwork, and related skills, are considered part of Intensive Services, not Training Services, and may be provided by ADW! or a partner agency without establishing an ITA. Providers of such Intensive Services do not need to be listed as an approved State Training Provider. Such services may, however, be secured by issuance of vouchers.

ITAs In Conjunction with OJTs or Registered Apprenticeship

ITAs may be provided to individuals in conjunction with On-the-Job Training (OJT) funds when appropriate, and the ITA may be used before, during, or after an OJT. Registered apprenticeships automatically qualify to be on a State's ETPL, but may not always be listed on the ETPL because apprenticeship programs may choose whether to be included. ITAs can be used for the following apprenticeship-related costs:

1. Tuition, books, and related for pre-apprenticeship training;
2. Tuition, books and related for classroom training that is part of the apprenticeship;
3. Supportive services

Restrictions

Individuals requesting training funds will not receive funds if they are in default with current student loans. FAFSA must be applied for when requesting funds, whenever FAFSA is available through school and/or individual eligibility.

Program life is defined as the time a participant spent in any particular program (i.e., Dislocated Worker, Adult, Young Adult). Therefore, a participant who is in a specific program can only receive the proposed amount per the time they are enrolled in the program.

Conflicts of Interest

Employees shall not have a personal interest in any actions in which they may be involved in selecting the vendor, executing a contract or purchase order, or negotiating or administering the contract or purchase order. Employees will not be allowed to solicit, obtain, accept, or retain any personal benefit (gift, favor, service, compensation, or discount) from any supplier, vendor, or any individual or organization doing or seeking business with the County. Employees having a potential personal interest in a County contract, purchase, payment, or other financial or monetary transaction shall give 72 hours written advance notice of the conflict to the County Attorney. Failure to disclose a conflict will not be tolerated. "Personal interest" includes an interest held by the individual or a family member, which includes, but is not limited to, a spouse, sibling, parent, son or daughter.

Informed Customer Choice

Participant choice is one of the basic principles of WIOA. Training services, whether accessed by ITAs, or under contract, must be provided in a manner that maximizes informed consumer choice in selecting an eligible training service provider in accordance with the goals and objectives outlined in the participant's individual employment plan. ADW! employees will assist the participant with career choices; however, the ultimate decision rests with the customer. Priority consideration shall be given to programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area, as identified by the WDB. Consequently, WFS are expected to promote and enable participants to make choices regarding training providers and programs that have the highest likelihood of employment and financial independence. WFS should refrain from expressing preferences in regard to training providers that are not based on performance outcomes and cost. However, in consulting with participants, it is essential that participants have a viable financial plan in place, whether they wish to select a public or private provider. The selection of training areas should also be guided by the occupations in demand as issued by the Colorado Department of Labor and Employment. WFS are expected to consult the ETPL (and make the ETPL available to participants) on a regular basis. Training in areas not referenced as in-demand must be accompanied by alternate documentation of demand and/or placement commitments from employers.

In order to enhance individual participant choice in their education and training plans and provide flexibility to service providers, the U.S. Department of Labor (USDOL) allows ITAs for out-of-school young adults, ages 18 to 24, using WIOA young adult program funds when appropriate.

Documentation

Individual case file must contain a copy of an ITA commitment or agreement document and supporting training source documentation that identifies at a minimum the training cost, the provider and program, and start and end dates for the training. Participants will receive a comprehensive assessment and/or evaluation to determine the need for training services prior to selecting a training program. Upon completion of the assessment/evaluation, the WFS will create and

maintain participant case files that contain a copy of completed assessments, the ITA agreement document (TRP) and supporting source documentation, signed by the participant and training vendor that identifies at a minimum the amount of funding, the school and program, a screen shot or printout that shows the WIOA approved program on the ETPL (at the time training is approved) and the duration of the ITA.

As part of an ongoing information sharing process, WIOA participants will be provided a Release and Disclosure form to review and sign authorizing the release of financial aid information, education/training related coursework, billing/payment related information and any other information pertaining to training/education goals. Furthermore, the educational institution's financial aid officer will also be required to inform ADW! of amounts and dispositions of any Higher Education Act (HEA), Title IV awards and other types of financial aid awarded to a WIOA participant after enrollment. WFS will work collaboratively with the educational institution's financial aid officer to determine the amounts and dispositions of any awards prior to or after enrollment as part of this ongoing information sharing process.

Coordinating ITAs with Other Sources of Funding

Prior to an ITA being established, all WIOA participants will complete a financial analysis as part of their Training Request Packet to help determine training costs and appropriate mix of financial sources to ensure that the participant's financial needs are met. The financial analysis consists of reviewing the participant's ratio of personal/financial obligations in comparison to available financial resources (i.e., savings, income, unemployment insurances). Participants that are awarded Pell Grants will be informed that all other funding sources including WIOA funds will be used prior to the Pell Grant. Participants will also be informed that they are not required to apply for or access student loans or incur personal debt as a condition of participation.

The new section reads:

A WIOA participant may enroll in WIOA-funded training while an application for a Pell Grant is pending as long as the workforce center has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the one-stop center the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses.

Training benefits funded by the Veterans' Administration are not included in the category of "grant assistance from other sources" and eligible veterans and spouses are not required to coordinate their entitlement to those benefits with their eligibility for WIOA-funded training.

Monitoring of the ITA

ADW! will conduct regular oversight and internal monitoring for compliance with the WIOA federal and state requirements. The frequency of monitoring and reviews can be found in ADW!'s Internal and Sub-Recipient Monitoring Policy.

Exceptions to the ITA and the ETPL Requirements

There are several exceptions to the required use of an ITA for training. In situations covered by these exceptions, a contract for services may be used to provide for training in lieu of an ITA or in combination with an ITA:

1. OJT, customized training, incumbent worker training, internships, paid or unpaid work training experience, and transitional employment are not included on the ETPL and therefore are not subject to the eligibility requirements. The state has elected to not require

any additional performance information for these types of training, therefore, the ADWB will identify criteria for selecting such contractors in local policy.

2. Should the ADWB determine that there are an insufficient number of eligible providers in the local area to accomplish the purpose of an ITA, the local plan and local policy will describe how this determination was made and the process used for contracting for services. This process will include a public comment period of interested provider of at least 30 days.
3. If the ADWB determines that a community-based organization (CBO) or non-profit whose primary mission is to serve individuals with barriers to employment provides effective training services, the ADWB will develop criteria in local policy to determine that the program is effective. The criteria may include:
 - a. Financial stability of the organization;
 - b. Demonstrated performance in the delivery of services to individuals with barriers to employment through program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment;
 - c. How the specific program relates to the workforce investment needs identified in the local plan; and
 - d. Other criteria determined by the local board.
4. When the Local Board determines that it would be most appropriate to contract with an institution of higher education or other eligible provider of training services to facilitate training for multiple individuals in in-demand industry sectors or occupations, as long as the contract does not limit the individual's consumer choice. In this exception, the training provider must still be on the ETPL.
5. Circumstances in which a pay-for-performance contract is appropriate, the ADWB will determine if it is appropriate to utilize this strategy.

**ONLY THE ADW! TALENT DEVELOPMENT MANAGER AND/OR ADW! DEPUTY DIVISION MANAGER
MAY GRANT EXCEPTIONS TO PROVISIONS WITHIN THIS POLICY.**