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<b>Subject:</b>	Arapahoe/Douglas Works! Classroom Training
<b>Policy Number:</b>	ADWDB-04-2024
<b>Replaces:</b>	ADWDB-12-2021
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<b>Distribution:</b>	Arapahoe/Douglas Works! Workforce Center Leadership and Employees

ALL SEPTEMBER 2024 REVISIONS ARE HIGHLIGHTED IN YELLOW

The Arapahoe/Douglas Workforce Board (ADWDB) has designated Arapahoe/Douglas Works! as the provider of Career Services for WIOA Title I: Adult, Dislocated Worker and Young Adult programs, Title III: Wagner-Peyser, and Temporary Assistance for Needy Families (TANF).

## CITATIONS/REFERENCES

- 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, Change 2- Individual Training Accounts for WIOA Title I Adult and Dislocated Worker Programs

## PURPOSE

To establish guidance, processes and procedures for Classroom Training and Work-Based Learning funding.

## 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 and other Arapahoe/Douglas Works! grants.

Under Title I of WIOA, training services must be provided in a manner that maximizes informed customer choice in selecting an eligible provider. The Arapahoe/Douglas Workforce Board (ADWDB), through Arapahoe/Douglas Works!, 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 ETPL, and are approved for use of WIOA funding, are able to redeem ITAs for payment.

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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 priority groups as defined in the Priority of Service for Title I Adult Programs' PGL.

## POLICY/ACTION

### TRAINING AMOUNTS/CAPS FOR ADULTS, DISLOCATED WORKERS AND YOUNG ADULTS

**Any Training Request Packet (TRP) approved on or after the implementation of this policy will be subject to the below caps.**

Funding limits are determined by the ADWDB and are reviewed as needed annually. The maximum funding limit for tuition and occupational training, GED tutoring/instruction, and work-based learning is \$6,000.00 per participant per program life-enrollment. Program enrollment is defined as the time a participant spends in any particular program (i.e. Dislocated Worker, Adult, Young Adult) from the date of enrollment to the date of exit. Co-enrollment is defined as the time a participant is actively enrolled in two or more programs simultaneously, though enrollment and exit dates may differ the active enrollment must overlap. Co-enrolling participants into other Arapahoe/Douglas Works!'s programs is highly encouraged. The maximum funding limit for training and work-based learning for those co-enrolled into other Arapahoe/Douglas Works! programs is the cap of the higher funding limit plus \$2,000. Operationally, funding limits are determined quarterly by the Workforce Programs Manager and/or Division Manager based on funding levels and business needs (not to exceed the ADWDB funding limit).

Following various criteria (i.e., data analysis of employment concentrations and significant economic impact), the ADWDB has determined the following in-demand industry sectors: Aerospace and Aviation, Air Transportation, Bioscience, Broadband, Construction, Engineering Services, Finance and Insurance, Healthcare, Hospitality, Manufacturing, and Information Technology. If funding levels allow, training in Arapahoe/Douglas Works!'s Regional Targeted Industries may be funded at a higher amount than non-targeted industries (not to exceed the ADWDB's maximum funding limit). Training assistance may be provided for short-term training completed within 18 months in approved targeted industries. Any training that exceeds 18 months from the first date of classes/instruction/curriculum access, will need Manager approval via memo. Training outside of Arapahoe/Douglas Works!'s Regional Targeted Industries may be funded at a lower amount than targeted industries, not to exceed the ADWDB's maximum funding limit. 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 Arapahoe/Douglas Work's Regional Targeted Industries, but may not exceed the maximum funding limit.

~~Training assistance may include stackable credentials that are identified as a career pathway and will result in the participant acquiring industry recognized certificates.~~

Funding limits for tuition and training and work-based learning are maximum allowable costs for potential trainings, but they are not guaranteed amounts for individual participants requesting training assistance. If, for example, a participant has been approved for Regional Targeted Industries classroom training and has expended less than

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the maximum limit, they 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.

The ADWDB maximum funding limit applies to all CDLE funding resources for training services (i.e., BS, PV, OC, WE, AC, PA, WP, and OJ) that are allocated to Arapahoe/Douglas Works!. 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. If CDLE programmatic funding resources specify, through funding provisions or Policy Guidance Letters, a higher funding limit than the ADWDB maximum funding limit, Arapahoe/Douglas Works! may use the higher funding limit. If CDLE programmatic funding resources specify, through funding provisions or Policy Guidance Letters, a lower funding limit than the ADWDB maximum funding limit, Arapahoe/Douglas Works! must use the lower funding limit.

The 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 ETPL and/or on the Procurement List (applicable for Young Adults). Any exceptions to this process must be documented with rationale and signed off by a member of the WIOA Leadership Team.

For allowable incentive amounts for Young Adults, please see local policy for WIOA Title I Youth Incentive Payments. In addition, the above funding limitations do not apply to supportive service as noted in the Arapahoe/Douglas Works! supportive service policy.

## REQUIREMENTS

~~The approved Training Request Packet will be waived for all non-WIOA discretionary grants unless the Training Request Packet is a requirement of the grant.~~

**An approved Training Request Packet (TRP) or modified TRP will be required for WIOA and non-WIOA grants unless the requirement is waived by the Program Manager.**

- ~~Individuals requesting training funds must have participated in one or more career services prior to receiving training assistance. All TRPs require Arapahoe/Douglas Works! WIOA TRP Committee or Program Supervisor or Program Manager approval prior to issuance of funds. Any training costs incurred prior to enrollment in the WIOA any Arapahoe/Douglas Works! program (along with completion of the TRP and Program Supervisor or Manager approval) will not be paid for by WIOA Arapahoe/Douglas Works!'s program funds. For semester-based training programs, enrollment in the WIOA any program along with completion of the TRP, and Arapahoe/Douglas Works! WIOA TRP Committee or Program Supervisor or Manager approval of the training request TRP 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 a ~~n Occupational Research Activity/~~TRP. The ~~Arapahoe/Douglas Works! WIOA TRP Committee or~~ Program Supervisor ~~or Manager~~ will review each TRP and consider current and projected labor market Information for final training approval. A modified TRP ~~will~~ may be accepted in situations that include but are not limited to: already in school or has been accepted into a Registered Apprenticeship or Pre-Apprenticeship Program. In circumstances that necessitate a waiver of a TRP, a memo approved by Division Manager, Administrator, or Program Manager is allowed.

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

*Applicable for Youth/Young Adults only:* Arapahoe/Douglas Works! 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 program services. 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. 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.
2. 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.

## **RESTRICTIONS**

- ~~Individuals~~ Participants who successfully or unsuccessfully engaged in training through any workforce center in the state of Colorado within the past 5 years ~~requesting WIOA Arapahoe/Douglas Works! training and work-based learning resources funds to include ITAs and work-based learning opportunities~~ are not eligible for ~~WIOA Arapahoe/Douglas Works! training or WBL resources funds~~ if they have ~~previously received WIOA training or WBL funding from any workforce center in the state of Colorado within the past 5 years~~. These participants may still receive career services ~~through WIOA~~. Exceptions to this policy will be considered on a case-by-case basis and requires approval from the Program Manager. Participants must provide rationale to their workforce specialist for requesting additional training or WBL. Workforce specialists will include this rationale in a memo submitted to the Program Manager for consideration.
- ~~Individuals who do not successfully complete any training or WBL activity funded by Arapahoe/Douglas Works! programs WIOA funded program, and/or do not demonstrate follow-through, will not be eligible for future WIOA program services. Exceptions to this policy will be considered on a case-by-case basis and requires approval from the Talent Development Manager.~~
- ~~Individuals~~ Participants that have met the ~~lifetime~~ enrollment/co-enrollment training cap within the past 5 calendar years are not eligible for training or WBL funding through Arapahoe/Douglas Works! ~~if funding based on the current Arapahoe/Douglas Works! policy. Exception to this policy will~~ Exceptions may considered on a case-by-case basis and requires approval from the ~~Talent Development~~ Program Manager.
- ~~Individuals requesting training funds will not receive funds if they are in default with current student loans. Documentation that student loans are in deferment or positive status must be documented in the program file prior to the issuance of an ITA. FAFSA must be applied for when requesting funds, whenever FAFSA is~~



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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.~~

- ~~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.~~
- Participants must maintain a minimum of a 2.0 GPA (or equivalent) **or satisfactory curriculum progress, and attendance** to continue to receive Arapahoe/Douglas Works! training assistance. If participants fall below this or fail one or more courses, **future funding will be discontinued. 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.** 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, including when Arapahoe/Douglas Works! receives reimbursement from the training provider.
- Participants that have completed training and are approved for **Arapahoe/Douglas Works! Program funding services** to pay for a state licensure will receive funding for up to two (2) 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). A TRP or Modified TRP is not required for participants requesting licensure payments as this is an allowable supportive service.
- Any training extensions must receive prior approval by Workforce Specialist and must be updated in case notes. **and Individual Employment Plan (IE) or RoadMap.**

WFS are required to obtain progress reports/grades for each semester as applicable and/or after completion of certificate for short term trainings, from the participant for further funding through **any program.** ~~the WIOA programming.~~

Basic skills development, including academic, keyboard, computer, problem-solving, teamwork, and related skills, are considered part of Career Services, not Training Services, and may be provided by Arapahoe/Douglas Works! or a partner agency without establishing an ITA. Providers of such Career 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 participants** 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 the 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;

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2. Tuition, books and related for classroom training that is part of the apprenticeship;
  - i. For the classroom training of an apprenticeship to be paid using WIOA funds, the training provider must be listed on the ETPL.
3. Supportive services

## 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. **Arapahoe/Douglas Works!** 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.

## 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 **asking the customer to review training and supportive services costs, and assess these costs in relation to funding available through Arapahoe/Douglas Works! Programs, and identify other sources of funding they can use to pay the balance (i.e. savings, payment plans, employment, family or employer commitments, FAFSA awards).** ~~reviewing the participant's ratio of personal/financial obligations in comparison to available financial resources (i.e., savings, income, unemployment insurances).~~

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A **WIOA program** 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**

Arapahoe/Douglas Works! will conduct regular oversight and internal monitoring for compliance with the WIOA **and discretionary grants** federal and state requirements. The frequency of monitoring and reviews can be found in Arapahoe Douglas Work!'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 ADWDB will identify criteria for selecting such contractors in local policy.
2. Should the ADWDB 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 ADWDB determines that a community-based organization (CBO) or non-profit whose primary mission is to serve **individuals participants** with barriers to employment provides effective training services, the ADWDB 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 participants** 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 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.

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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 participants 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 ADWDB will determine if it is appropriate to utilize this strategy.

## **DOCUMENTATION**

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, individual case files must contain a completed copy of the assessment/evaluation. Documents to support the chosen training must be contained in the case file, including but not limited to TRP, and supporting training source documentation that identifies at a minimum the training vendor name (which may include, but is not limited to: training vendor logo, training vendor letterhead, training vendor's email signature block, Arapahoe/Douglas Works!'s Training Cost Proposal Worksheet, etc.), program name, training cost, and start and end dates of the training. In addition, individual case files will include a screen shot or printout that shows the WIOA approved program on the ETPL (at the time training is approved).

As part of an ongoing information sharing process, WIOA program 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 Arapahoe/Douglas Works! 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.

## **ADWDB MEMBERS & ARAPAHOE/DOUGLAS WORKS! EMPLOYEES**

Arapahoe/Douglas Workforce Board (ADWDB) members as well as Arapahoe/Douglas Works! employees are not eligible for any Arapahoe/Douglas Works! funding. In addition, relatives of ADWDB members as well as Arapahoe/Douglas Works! employees are not eligible for any Arapahoe/Douglas Works! funding. Relatives are defined as: parents, spouses, children, cousins, grandparents, siblings, nephews, nieces, aunts, uncles, in-laws; please note, this is inclusive of step-family.

All participants in this category will be referred to other outlining counties for program-attached services. Any ADWDB board member relatives and/or Arapahoe/Douglas Works! employee relatives enrolled prior to July 1, 2008 will adhere to Local Policy #2008-21.

*Only the Arapahoe/Douglas Works! Division Manager and/or the Workforce Center Administrator(s) may grant exceptions to provisions within this policy.*

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