WIA TITLE I-B AND ARRA PROGRAM MANAGEMENT POLICIES AND PROCEDURES

MEMORANDUM #09-08

To:	**All WIA Title I-B ARRA Adult and Dislocated Worker Program Subrecipients**
Subject:	**Classroom Training**
Supercedes:	**Adult and Dislocated Worker Classroom Training #06-08A**
Effective Date:	**July 1, 2009**

A. BACKGROUND

The Workforce Investment Act (WIA) and American Recovery and Reinvestment Act (ARRA) allow for the provision of occupational skills training for eligible participants in the Title I-B and ARRA Adult and Dislocated Worker Programs through training services. The term "occupational skills training" means classroom-based training, or a combination of classroom and work-based under a single training curriculum, provided by a training institution.

As described in Memorandum #__-04, Workforce Development Council Snohomish County (WDCSC) has chosen to incorporate payment of occupational skills training within the WIA Title I-B and ARRA Adult and Dislocated Worker Personal Training Account (PTA) policy umbrella. Within the PTA structure, however, reimbursement of the training institution for tuition is to be tracked separately from other PTA activities under Individual Training Accounts (ITAs) and is subject to the additional policies below.

B. GENERAL POLICY

The ITA established on behalf of an eligible participant in need of training services who has the skills and qualifications to successfully complete the selected training program to enable that individual to purchase training services from the provider and program **of choice** selected from the Eligible Training Provider List (ETPL) in consultation with a WorkSource partner staff. Participants are expected to take an active role in managing their employment future through the use of ITAs. Customers receiving training under this approach will be provided the information they need (e.g., skills assessment, labor market conditions and trends, training vendor performance) to make a self-informed choice about their own employment future and the selection of an appropriate training provider.

Prior to the issuance of an ITA, a customer must receive a continuum of services in at least one of the core and one of the Intensive service categories. After receiving at least one core and one intensive service, a customer may be considered for referral for training. Individuals who have been assessed and identified with specific barriers to employment may be issued ITAs only after their specific barriers have been addressed.

All eligible training provider programs must be presented to participants through the Job Training Results System. A participant cannot be referred to a non-approved provider or program until application is made to, and approved by, WDCSC and the Workforce Training and Education Coordinating Board. The participant is to document that s/he has made an informed choice regarding her/his training provider and program on the Documentation of Informed Choice of Classroom Training Providers and Programs provided in Attachment A.

A thorough assessment of each candidate should be done prior to final approval of an ITA. Recommended assessment criteria include:

- Customer's educational level;
- Previous skills training;
- Employment readiness level;
- Career goals;
- Customer's aptitude for the selected training;
- Availability and length of training;
- Cost of training;
- Financial ability of customer to undertake and complete training;
- Potential for a customer to obtain employment at a livable wage.

The ultimate choice of an employment goal and subsequent training program requires careful consideration of a variety of factors. The Workforce Investment Act Training Checklist (attached) documents the topics that should be covered when a seeker services staff member works with a client on the selection of a training program. The Training Program and Money Management portions of the checklist **along with the required elements should be completed and placed in the client file prior to the start training**. The Job Search Strategy section should be revisited with the client near to the completion of training. The associated case notes in SKIES should document the conversations and plans that have taken place with the client around all training aspects.

ITAs may be used to acquire occupational skills training outside of Snohomish County with state approved eligible training provider programs in other Workforce Development Areas. Out-of-state training providers may be used only if they are on the ETPL for Washington State. Additionally, a given participant's willingness to travel out-of-state must be documented in her/his <u>Individual Employment Plan.</u>

WIA Title I-B and ARRA funds cannot supplant financial aid available through the training institution. WIA and ARRA funding for training is limited to customers who are unable to obtain other grant assistance for training or who have a financial need that exceeds the assistance available from other sources. Training providers must consider the availability of Pell Grants and other grant sources to pay for training costs, so that WIA and ARRA funds supplement rather than replace the other sources of training grants. Additionally, the Site Operator must approve the granting of an ITA to an individual who has defaulted on a Federal grant or loan on an exception basis and only after careful review of any exceptional circumstances that lead to the default. All correspondence associated with the request and granting of the exception must be thoroughly documented in the participant's file.

ITAs may be used to fund classroom training for clients completing an apprenticeship program.

Site Operators may make payment to a selected training institution in a variety of ways including electronic transfer of funds through financial institutions, vouchers, or another appropriate method. Payments may also be made incrementally, through payment of a portion of the costs at different points in the training course.

Site Operators must make payment to a selected training institution on a "pay as you go" basis and participants must make ***satisfactory progress*** to continue to receive WIA and ARRA funded ITA payments for training. ***Satisfactory progress*** is defined as:

- completing all courses funded through a WIA and/or ARRA ITA and
- maintaining a Grade Point Average of 2.0 overall.

It is understood that the information needed to determine if a participant is or is not making satisfactory progress as defined above may not be available at the time a participant must be registered for the subsequent quarter. However, once documentation is obtained, ITA payments should be terminated for the following quarter should it be determined that the participant did not make satisfactory progress during a prior quarter. Copies of the participant's grades must be retained in the participant file as received and notation made in the case notes that the grades were reviewed, whether the participant is making satisfactory progress, and actions taken as a result, if any.

Only required costs associated with approved training programs will be covered. Optional costs, including tuition and fees for coursework not included in the required course of study; textbooks not listed as required on course syllabi; and supplies, training materials, and tools which are not required for all participants in the training program, are not covered. Exceptions will be considered on a case by case basis within the ITA support service policy and must be pre-approved by Site Operator.

Required costs covered through an ITA for approved training programs are as follows:

- tuition, enrollment fees, and other fees such as lab and testing required for coursework outlined in the required course of study;
- required textbooks as listed on course syllabi;
- required supplies and training materials as listed on course syllabi or supply lists; and required tools as listed on course tool lists.
- Prerequisite coursework may be included under the maximum authorization and duration as long as it is obtained from an eligible training provider.

C. ADDITIONAL Center Site Operator Responsibilities

It is the responsibility of the Site Operator to ensure that WDCSC's intent of dedicating 75% of its ITA resources to industry clusters identified in by Blueprint Snohomish County at http://www.snocoblueprint.org is met.

It is the responsibility of the Site Operator to ensure that procedures are in place to ensure each participant is able to make an informed choice in the selection of a training provider and program.

It is the responsibility of the Site Operator to review and approve all occupational skills training Individual Training Accounts within established policies; to maintain a system of obligating and re-obligating funds; to maintain a system for issuing a monthly statement to each participant of her/his PTA and ITA balances; to track all tuition expenditures by participant; to ensure all record of eligibility for participation in occupational skills training, all documents which support the occupational skills training, time and attendance records if appropriate and necessary, training institution reimbursement information, and all transcripts and grade and/or progress reports for a given participant are maintained in the participant file; and to provide any and all Federal, State, County, and WDCSC monitors and auditors with access to such records.

WDCSC reserves the right to make exceptions to this policy, on a case by case basis, should individual circumstances warrant exception.

Workforce Investment Act Training Requirements

Client: ___________________________________ **Training Program:** ____________________

Type of Degree: _______________ **Training Institution:** _____________________________

Case Manager: ____________________________ **Date:** _________________

Classroom Training Minimum Standards

The following are topics that will be covered by the participant and case manager during the process of preparing for training. Note that the Training Plan column includes important points to discuss during the development of the training plan. Those conversations should be documented in the case notes. The Training Elements column details the required forms needed for a client to attend a training program. In general, participants work on identifying their occupational and/or career interests, research the education and/or training requirements and then go through the process of creating a plan that will ultimately lead to employment success.

The case manager should lead a discussion with the client about their employment goals and how training may or may not be able to help them meet those goals. Vocational interests, work style and environment, and preparation for training should be explored. In addition, any developmental needs should be discussed such as the need for remedial education or accommodations for a disability. These conversations should be clearly documented in case notes.

Attachment A

Workforce Investment Act Classroom Training Requirements

Client: ______________________________ **Training Program:** ___________________

CLASSROOM TRAINING CHECK LIST

Training Plan	Training Elements
Self Evaluation: ☐ Interests, values, roles and skills ☐ Preferred work environment ☐ Developmental needs (remedial education or other needs) ☐ Prepared for training	☐ Initial assessment ☐ Assessment instruments such as CAPS, COPS, COPES, CT Choices ☐ Individual Employment Plan ☐ Self Sufficiency Matrix/Calculator
Match: ☐ Identify possible occupations and careers ☐ Evaluate training institutions ☐ Explore alternatives to training ☐ Choose short and long term options	☐ Demand Decline List ☐ ETPL for school and program ☐ CAT application (if applicable)
Action: ☐ Investigate occupations and careers ☐ Training and education needs ☐ Research industries and labor market ☐ Research schools and compare costs ☐ Entry requirements for school and program ☐ Meet with an academic advisor/ admissions counselor at college ☐ Develop a course schedule for each term of chosen program with advisor	☐ Course Description ☐ Documentation of Informed Choice ☐ Participant Agreement ☐ Personal Training Account Tracking Form ☐ Status Form
Money Management & Financial Aid	**Training Elements**
Financials: ☐ Program Costs **Budgeting:** ☐ Household ☐ College	☐ Budget ☐ FAFSA application and/or determination
Research grants and scholarships: ☐ Attend financial aid workshop ☐ Research Loans (Calculate interest and determine college term payments) ☐ Research and apply for grants and scholarships	
Job Search Strategies Upon Completion of Training	**Training Elements**
Research: ☐ Job Search Strategies discussed and documented ☐ Informational interviews, job shadows, internships, volunteering, and/or service learning ☐ Gather industry sector and/or potential employer information	☐ Document in case notes ☐ IEP revisions

Employment Plan:	
☐ Make appropriate revisions to IEP to reflect job search strategy	

Currently Enrolled Clients	Training Elements
For those clients currently in a training program	☐ Grades for previous quarter(s)/semester(s) ☐ Current attendance sheets ☐ Current quarter/semester registration