



## **TRAINING SERVICES, including requirements for work-based training**

### **BACKGROUND**

This section provides policy for Training Services that are available to unemployed or underemployed Adults, Dislocated Worker and Youth Program participants.

Training prepares individuals with the in-demand skills that meet employers' needs based on labor market information, sector strategies, career pathways, and business outreach. Through job driven training, individuals acquire the skills needed to obtain and/or retain employment and increase earnings which lead to self-sufficiency.

### **AUTHORITY**

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128)
- Code of Federal Register 20 Part 680 and 681
- Training and Employment Guidance Letter (TEGL) 17-05
- Training and Employment Guidance Letter (TEGL) 15-10
- Training and Employment Guidance Letter (TEGL) 19-16
- Training and Employment Guidance Letter (TEGL) 21-16

### **PROGRAM PARTICIPANT ELIGIBILITY FOR TRAINING SERVICES**

#### **A. Adult and Dislocated Worker Program Participants**

Training services, based on availability of funding, may be made available to employed and unemployed individuals enrolled in the Adult or Dislocated Worker Programs who:

- a. A Career Advisor determines, after an interview, evaluation, or objective assessment, and career planning, are:
  1. Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
  2. In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
  3. Have the skills and qualifications to participate successfully in training services.
- b. Select a program of training services that is directly linked to the employment opportunities in the local area or in another area to which the individuals are willing to commute or relocate;
- c. Are unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, Trade Adjustment Assistance (TAA), and Federal Pell Grants established under title

IV of the Higher Education Act of 1965, or require WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants); and  
d. If training services are provided through the adult funding stream, are determined eligible in accordance with the State and ARIZONA@WORK Southeastern Arizona priority of service.

1. There is no required minimum time period for participation in career services before receiving training services.
2. Workforce specialists must provide a justification for training via detailed documentation in case notes and in each participant's Individual Employment Plan.

At a minimum, the documentation must contain the following program elements:

- a. Summation of the interview identified in Section 403(A)(i)(a);
- b. Assessment results identifying skill gaps;
- c. Labor market information supporting the decision to pursue training; and
- d. The program of study including:
  1. Start date of training; and
  2. Anticipated end date of training
  3. Documentation should clearly indicate- the targeted outcomes of the training. It should provide an unquestionable understanding between the Workforce specialist and the program participant of each step-in program participation.
  4. Case notes and the IEP must clearly indicate how the training will be applied to job search and when job search is anticipated to start and program participation is expected to end (Program exit date).

### **B. Youth Participants**

1. The Youth Program must make each of the 14 program elements available to eligible youth program participants. Of the 14 elements, Occupational Skills Training qualifies as training for youth participants.

### **TYPES OF TRAINING SERVICES**

A. Training services for eligible participants must be directly linked to the employment opportunities in either Southeastern Arizona or in another area where the participant is willing to relocate. Training services may include:

- i. **Occupational Skills Training** that is designed to meet the technical needs of the workplace and provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by specific occupational fields. Occupational skills training includes training in non-traditional employment. The selected training must meet the following criteria:
  - a. Providers of occupational skills training must be listed on the Eligible Training Provider List (ETPL) and the specific training program must be listed as WIOA approved.

- b. Outcome-oriented and focused on the occupational goal specified in the IEP;
  - c. Result in the attainment of a post-secondary credential; and
  - d. Provide a reasonable expectation that the WIOA participant will gain self-sufficient employment upon completion of training.
  - e. Priority consideration must be given for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in Southeastern Arizona.
- ii. **Occupational skills training (YOUTH PROGRAM)** is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupational field at entry, intermediate or advanced levels.
  - a. Occupational skill training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in Southeastern Arizona.
  - b. Such occupational skills training must:
    - 1. Be outcome oriented and focused on an occupational goal specified in the ISS;
    - 2. Be of sufficient duration to impact the skills needed to meet the occupational goal; and
    - 3. Result in the attainment of a recognized postsecondary credential.
  - c. The occupational skills training must meet the following criteria used to identify youth training providers in the local plan to include determining whether:
    - 1. Training is related to in-demand occupations or career pathways identified in the state and local plans; and
    - 2. A recognized credential is awarded upon the successful completion of a training program.
  - d. Occupational skills training must be competitively procured by contract or grant. Out of School Youth ages 16-24 may be issued an Individual Training Account (ITA) with a specified dollar amount to provide training using WIOA youth funds based on the needs identified in the ISS.
  - e. If an Individual Training Account (ITA) is used to pay for the training, the training program must be listed as an approved program on the Eligible Training Provider List.
- iii. **Programs that combine workplace training with related instruction**, which may include cooperative education programs.
- iv. **Skill upgrading and retraining** is short-term or part-time training designed to upgrade skills in the workplace and provide retraining to enhance current skills.
- v. **Entrepreneurial training** on the responsibilities of organizing, managing, and operating a business or enterprise.
- vi. **Transitional Jobs** provide a time-limited work experience that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history.

- a. Transitional jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.
  - b. The Southeastern Arizona Local Workforce Development Board may approve the use of not more than 10 percent of the combined total of adult and dislocated worker allocations for transitional jobs.
  - c. Transitional jobs must be combined with comprehensive career services and supportive services.
- vii. **Adult Education and Literacy** activities include English Language Acquisition and integrated education training programs, provided concurrently or in combination with:
- a. Occupational skills training;
  - b. On-the-job training;
  - c. Incumbent worker training;
  - d. Programs that combine workplace training with related instruction;
  - e. Training programs offered by the private sector;
  - f. Skill upgrading and retraining;
  - g. Entrepreneurial training

NOTE: Programs that combine Adult and Literacy activities with Occupational Skills training and skill upgrading must be listed on the Eligible Training Provider List (ETPL). Only the Occupational Skills Training or Skill Upgrading and Retraining component of the training must meet ETPL performance criteria.

- viii. **Job readiness training** if offered in combination with:
- a. Occupation skills training;
  - b. On-the-job training;
  - c. Incumbent worker training;
  - d. Programs that combine workplace training with related instruction;
  - e. Training programs operated by the private sector;
  - f. Skill upgrading and retraining;
  - g. Transitional jobs; or
  - h. Entrepreneurial Training.
- ix. **Registered Apprenticeship** based on an approved set of National Guidelines for Apprenticeship Standards developed by a national committee or organization which includes on-the-job training and related technical instruction in a classroom instruction setting.
- a. On-the-job training may be provided to eligible individuals as part of the registered apprenticeship program participation for qualified participants.
- x. **Work-Based Training** that results in transferable skills within the industry in which the worker is currently employed and/or other growing industries within the Southeastern Arizona and in an occupation with a high potential for sustained demand or growth as determined by the Southeastern Arizona Local Workforce Development Board.

a. Work-based training must not:

1. Displace any currently employed workers (including a partial displacement such as a reduction in non-overtime work, wage, or employment benefits);
2. Impair an existing contract for services or a collective bargaining agreement;
3. Procure, contract for, or incur costs to be paid from WIOA Title IB program funds prior to the start date, as determined by the date when all parties sign the contract;
4. Be provided to any company that has relocated within the previous 120 days of its application if the relocation has resulted in any employee losing his or her job at the original location;
5. Include proprietary training specific to a company, unless skills are determined to be transferable to other businesses or industries; and
6. Be used to directly or indirectly assist, promote, or deter union organizing.

b. Work-Based Training includes the following types of training. The trainings are not subject to the ETPL except for Registered Apprenticeship Programs:

1. **On-the-Job Training (OJT)** provided under a contract with an employer or registered apprentice program sponsor in the public, private non-profit or private sector. The employer is reimbursed a percentage of the wage rate of the participant being trained while engage.
  - a) **Employer reimbursement** payments are deemed payments for taking on extraordinary costs associated with training of participants and the potentially lower productivity of the participants while in OJT. Employers are not required to document the extraordinary costs
  - b) Employers may be reimbursed up to 50 percent of the wage rate of OJT.
  - c) **Time limits** on OJTs must be based on the following criteria, but not to exceed three months in duration:
    - 1) Skill requirement of the occupation;
    - 2) Academic and skill level of the participant;
    - 3) Prior work experience; and
    - 4) The goals outlined on the participant's IEP.

OJTs may be extended to not longer than six months in total duration with supervisor approval.

- d) **On-the-Job Training for Eligible Existing Workers:** contracts may be written for eligible existing workers under the following conditions:
  - 1) The employee is not earning a self-sufficient wage as determined by ARIZONA@WORK Southeastern Arizona policy; and
  - 2) The training relates to:
    - Introduction of new technologies;
    - Introduction to new production or service procedures;
    - Upgrading to new jobs that require additional skills
- e) **On-the-Job Training and Registered Apprenticeship Programs** OJT contracts may be written with Registered Apprenticeship programs or

participating employers in the Registered Apprenticeship program to cover the on-the-job training portion.

- 1) ITAs can be combined with on-the-job contracts when placing participants into Registered Apprenticeship programs.
- 2) OJT contracts with Registered Apprenticeship programs must be consistent with other OJT requirements in this policy including those for existing workers in section 404(ix)(b)(1)(d)

**2. Incumbent Worker Training** designed to help the ARIZONA@WORK Southeastern Arizona's workforce obtains the skills necessary to retain employment and prevent job loss. Training activities are carried out by the local workforce development board in conjunction with employers or a group of employers (which may include employers in partnership with other entities for delivering such training) for the purpose of assisting such workers in obtaining the skills necessary to retain employment or avert layoffs. An incumbent worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA, unless they also are enrolled as a participant in the WIOA Adult or Dislocated Worker program.

**a) Incumbent Worker Eligibility Requirements**

To qualify as an incumbent worker, the individual must:

- 1) Be employed;
- 2) Meet the Fair Labor Standards Act for an employer-employee relationship; and
- 3) Have an established work history for at least six months with the employer.

NOTE: In the event that the incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six (6) months or more as long as a majority of those employees being trained do meet the employment history requirement.

**b) Funding Incumbent Worker Training**

- 1) Up to 20 percent of the combined total of the Adult and Dislocated Worker allocation may be reserved for incumbent worker training.
- 2) The amount reserved for incumbent worker training must be approved by the Southeastern Arizona Local Workforce Development Board.
- 3) Employers participating in incumbent worker training must pay the non-federal share of the cost of providing the training to their incumbent workers. The non-federal share of such cost must be determined by taking into consideration factors such as:
  - The number of employees participating in the training;
  - The wage and benefit levels of the employee (at the beginning and anticipated upon completion of the training);
  - The relationship to the competitiveness of the employer and the employees; and
  - The availability of other employer-provided training and advancement opportunities.

- 4) The non-federal share must not be less than:
  - 10 percent of the cost for employers with not more than 50 employees;
  - 25 percent of the cost for employers with more than 50 employees but not more than 100 employees.
  - 50 percent of the cost for employers with more than 100 employees.
- 5) The non-federal share provided by an employer may include the amount of the wages paid by the employer to a worker while the worker is attending the training program. The employer may provide the share in cash or in-kind.

**3. Customized Training** designed for the specific requirements of an employer or group of employers, which is related to new production or service procedures, upgrading to new jobs that require new skills, workplace literacy or other appropriate purposes as identified by the Southeastern Arizona Local Workforce Development Board. Upon completion of the training the employer must commit to employ or continue to employ the individual(s) who participated in the training.

- a) Eligibility for Employed Individual Customized training of an eligible employed individual may be provided for an employer or a group of employers when:
  - 1) The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment, as determined by Local WDB policy;
  - 2) The customized training relates to introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Southeastern Arizona Local Workforce Development Board.

#### **EMPLOYER ELIGIBILITY FOR WORK-BASED TRAINING**

All businesses must be located and conducting business within the state of Arizona. Each business agrees to:

- A. Complete an application and enter into a contract with the ARIZONA@WORK Southeastern Arizona service provider funding the training program;
- B. Adhere to applicable WIOA administrative requirements as well as the nondiscrimination and equal opportunity provisions of the laws;
- C. Provide a Training Development Plan that identifies the training clearly identifying the need and competencies that will be achieved for each individual selected to receive the training;
- D. Provide copies of a "Certificate of Completion" to the Southeastern Arizona Local Workforce Development Board for each individual who successfully completes the prescribed training program. Such certificates must contain the individual's name and the class or course completed through training;

- E. Employ, or in the case of incumbent workers continue to employ, an individual upon successful completion of training;
- F. Be available for ARIZONA@WORK Southeastern Arizona program monitoring on a scheduled basis;
- G. Provide quarterly post-training reports, including information on the retention and/or promotions of trainees and the impact training made on the business, for one year after the completion of the training.

## **ADMINISTRATIVE REQUIREMENTS FOR WORK-BASED TRAINING**

### **A. Performance Requirements**

Adult, Dislocated Worker and Youth service providers must collect performance data to ensure employers who are participating in work-based training are fulfilling their commitment to hire training participants after they complete the training programs.

- i. Adult, Dislocated Worker and Youth service providers must not contract with an employer who previously received payments under WIA or WIOA if the employer has exhibited a pattern of failure to provide training participants with continued long-term employment that includes wages, benefits (as well as health benefits) and working conditions that are equal to regular employees who worked the similar length of time and are doing the same type of work.

## **ADULT, DISLOCATED WORKER AND YOUTH SERVICE PROVIDER RESPONSIBILITIES**

### **A. The Adult, Dislocated Worker and Youth service provider responsibilities for work-based training consist of:**

- i. Identifying a point of contact in the LWDA who will assist the business customer with questions and concerns, and provide overall support for the contract;
- ii. Incorporating the employer's Training Development Plan into the IEP and identifying any other barriers or services needed;
- iii. Monitoring during the training period and upon completion of the training contract;
- iv. Recommend funding limitations to the Southeastern Arizona Local Workforce Development Board;
- v. Developing policies and procedures for in-kind contributions (e.g. costs of training space or facilities at an employer's place of business used during training);
- vi. Identifying during the application process how the training program will benefit individual workers participating in training (i.e., promotion, increased wage, career ladder, attainment of self-sufficiency, layoff aversion);
- vii. Reviewing WIOA participant progress in the work-based training(s) and determining if supportive services are needed;
- viii. Monitoring the work site upon placement of the WIOA participant after completion of training to document whether the WIOA participant is working in the agreed upon position, at the agreed upon salary, and utilizing the skills obtained through the customized training;



- ix. Including a provision in the contract with the employer for contract termination due to lack of funds or lack of WIOA participant attendance in the training;
- x. Including a provision in the contract with the employer permitting LWDA, state, and federal staff to review the training records; and
- xi. Creating a list of eligible providers of work-based training opportunities.
- xii. Monitor each onsite contract for the purposes of determining that providers are in compliance with the contract, including:
  - a. Payroll, time, and attendance records substantiate the
  - b. amounts claimed for reimbursement; and
  - c. Training, wages, hours, benefits, and working conditions are
  - d. provided in accordance with the contract.
- xiii. Monitor the performance and progress of the LWDA participant on a regular basis to determine if:
  - a. Continued participation is required;
  - b. Transfer to another activity is appropriate;
  - c. Placement in unsubsidized employment has occurred; and
  - d. Other services would be more appropriate.
- xiv. Visit program participants and their supervisors at the worksites to:
  - a. Assist in job-related or personal counseling; and
  - b. Provide job coaching.

## **CREDENTIALS**

- A. Training programs approved by Workforce specialists for qualified Adult and Dislocated Worker program participants must result in either a federally-recognized credential to be approved for the Eligible Training Provider List (ETPL) or a locally recognized training as defined in the AJC Service Code Dictionary. The ETPL consists of programs approved for use by Workforce Investment and Opportunity Act Title I-B.
- B. Workforce specialists are encouraged to approve programs of training for qualified program participants that result in the attainment of federally-recognized credentials that have four attributes that add value to a credential include:
  - a. Industry-Recognized: An industry-recognized credential is one that either is developed and offered by, or endorsed by, a nationally recognized industry association representing a sizeable portion of the industry sector; or a credential that is sought and accepted by companies within an industry sector for the purposes of hiring or recruitments which may include credentials from vendors of certain products.
  - b. Stackable: A credential is considered stackable when it is part of a sequence of credentials that can be accumulated over time to build up an individual's qualifications and help them to move along a career pathway or up a career ladder to different and potentially high paying jobs.
  - c. Portable: A credential is considered portable when it is recognized and accepted as verification of the qualifications of an individual in other settings; either in other geographic areas, at other Department of Economic Security

December 29, 2015 Revision date: August 22, 2016 educational institutions, or by other industries or employing companies.

- d. **Accredited:** Accreditation helps to ensure that an educational program that is provided by an institution of higher education meets acceptable levels of quality.

C. **Federally-Recognized Credentials** are awarded in recognition of individual attainment of measurable technical or occupational skills necessary to obtain employment or advance in an occupation. They are an attestation of qualification or competence issued to an individual by a third party (such as an educational institution or an industry or occupational certifying organization) with the relevant authority or assumed competence to issue such a credential.

**Types of Federally-Recognized Credentials:**

Federally-recognized credentials include the following:

1. **Educational credentials** include diplomas, degrees, and certificates. Credit hours are the building blocks for education credentials.

Types of educational credentials include the following:

1. High school diploma;
2. GED or High School Equivalency (HSE);
3. Educational certificates;
  - a) Certificates must be based on credit hours.
  - b) Educational certificates are awarded after completion of an organized program of study at the postsecondary level, not a single course.

NOTE: Educational certificates must be recorded in AJC as Other Recognized Diploma, Degree or Certificate.

c) Certificates of completion may be educational certificates if they are based on credit hours and awarded for the completion of an organized program of study, not a single course. Certificates of completion that do not meet this definition must not be considered a federally-recognized credential.

Certificates of completion that are awarded after successful completion of a training programs that prepares students to take Occupational License and Personnel Certification examinations must also not be considered federally recognized credentials.

4. Associate's diploma/degree;
5. Bachelor's diploma/degree; and
6. Postgraduate degree, such as Master and Doctoral degrees.

High School Diploma, GED and High School Equivalency (HSE) are only counted as federally-recognized credentials for WIOA Adult, Dislocated Worker and Youth credential rate performance measures, if the participant has retained or obtained employment or is in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

## 2. Industry Recognized Credentials

1. **Registered Apprenticeship Certificates** issued by a Registration Agency, either the State's Apprenticeship Office or the U.S. Department of Labor. For more information on Arizona's Apprenticeship Office, see <https://www.azdes.gov/apprenticeship/>
  - a. Interim credentials may be developed from an approved set of apprenticeship standards for the occupation. They are portable recognition of an apprentice's accomplishments and are issued based on recognized components of an apprentice able occupation.
  - b. Registered Apprenticeship Certificates must be recorded under the Other Recognized Diploma, Degree and Certificate category on the Outcome page in AJC.
2. Occupational Licenses are granted by state and federal agencies or regulatory bodies and are required for an individual to work in the occupation. Examples of Occupational Licenses include, but are limited to: cosmetology licenses, massage therapy licenses, commercial driver's licenses, or nursing licenses (see <http://www.careeronestop.org/toolkit/training/findlicenses.aspx>). Characteristics include:
  - c. They are defined by laws and regulations and are intended to set professional standards and ensure safety and quality;
  - d. Time-limited occupational licenses must be renewed based on meeting ongoing requirements;
  - e. Violations of the terms of the license may result in legal action;
  - f. Completion of a program of study that prepares an individual for an occupational license is not a credential;
  - g. Occupational Licenses may be required in addition to other credentials. The credential for completing the educational program must only be recorded in AJC if the participant successfully received an Occupational License as the license is required to work in the occupation.
3. **Occupational Certifications** attest that the individual has attained the necessary knowledge and skill to perform a specific occupation or skill. Characteristics include:
  - h. It must be industry-recognized or result in a professional association certification;
  - i. It is granted by third party non-governmental agencies, usually associations or businesses;
  - j. It is intended to set professional standards for qualifications, such as a certification for a crane operator or a Novell Network Certified Engineer;
  - k. It usually requires successful completion of an examination or assessment of the individual's knowledge and skills through an examination or assessment provided by a certifying body.
  - l. It usually requires a set amount of work experience or professional/technical experience;
  - m. It must usually be renewed after a certain time period; and
  - n. Violation of standards or requirements may result in suspension or revocation of the certification.

For a list of Occupational Certifications and certifying agencies, see <http://www.careeronestop.org/EducationTraining/Find/certificationfinder.aspx>

**C. Locally-Recognized Credentials:** Locally-recognized credentials are obtained after completing a training that has been determined by the Southeastern Arizona Local Workforce Development Board to not result in a federally-recognized credential, but which is determined of value due to its being required by local employers and to result in employment. Locally-recognized credentials include the following:

1. A certificate of completion received upon the successful completion of a program based on competencies and curriculum that are developed in partnership with employers within the LWDA. Training programs that result in this type of locally- recognized credential may be approved to be listed on the ETPL. This certificate of completion must be:
  - a. Obtained from the results of a valid, objective assessment;
  - b. Based on significant vocational content;
  - c. Portable from one employer or region in the state to another; and
  - d. Meaningful to employers.

Locally-recognized credentials are excluded in the performance reporting of the credential attainment rate indicator, as they are not federally-recognized. However, employment in the 2nd and 4th quarter after exit and median earnings in the 2nd quarter after exit will count towards performance, as appropriate.

## **FUNDING TRAINING SERVICES**

Funding for training is based on the availability of program funds and is limited to program eligible participants who are unable to obtain other grant assistance to pay for the cost of training or who require assistance beyond that available from other sources to pay for such training.

Career Advisors must coordinate funding arrangements and co-enrollments with One-Stop partners and other entities.

- A. Career Advisors must ensure that WIOA training funds are awarded only when no other sources of funding are available or the amount available is insufficient in covering the participant's training costs. Alternative sources of funding that may be available include, but are not limited to:
  - i. State-funded training funds;
  - ii. Trade Adjustment Assistance (TAA);
  - iii. Rehabilitation Act funds;
  - iv. Temporary Assistance for Needy Families;
  - v. Federal Pell Grant funds; or
  - vi. Other federal grant funds.
- B. In making the determination that WIOA funds are required, Career Advisors must take into account the full cost of training, including the cost of supportive services and other appropriate costs, to ensure the training is completed successfully.
- C. This provision does not apply to the GI Bill or other forms of Veterans Administration (VA) education or training benefits. Veterans and spouses are not

required to coordinate their entitlement to VA training benefits with WIOA training funds.

- F. Student loans are excluded when determining the individual's overall need for WIOA funds for educational costs.
- G. Individuals may be attending school when they become a WIOA participant; reimbursement of training costs is not allowed for payments made prior to WIOA program participation.

### **PELL GRANTS**

- A. Federal Pell Grants are awarded to cover tuition costs and education-related expenses, but only the amount of the grant that applies to the participant's tuition will be used to reimburse the expended WIOA funds.
- B. Pell Grant eligibility is established by completing the Free Application for Federal Student Aid (FAFSA - [www.fafsa.ed.gov](http://www.fafsa.ed.gov)). Workforce specialists must maintain documentation in the participant's file to support the eligibility determination and award of the Pell Grant.
- C. All eligible program participants pursuing training at a Pell Grant eligible institution must apply for a Federal Pell Grant. A participant may enroll in WIOA-funded training while his/her application for a Federal Pell Grant is pending. Following the award of the Pell Grant, the training provider must reimburse the respective program the amount that the Pell Grant covers from the WIOA funds used to underwrite the training.
- D. A completed agreement between the respective program and the educational institution must be on file as well as with the WIOA participant before any funds are paid to the training provider. This agreement must detail:
  - i. The amount to be initially paid by the program; and
  - ii. Between the training provider and the participant to reimburse the program through the Federal Pell Grant, if applicable.

### **INDIVIDUAL TRAINING ACCOUNT (ITA)**

ITAs are established and used to provide training services to eligible WIOA Adult or Dislocated Worker participants based on the training needs identified in the participant's IEP. ITAs are used for all training options that require use of the ETPL. Each training program requires a separate ITA.

Approval of all ITAs issued for training must be documented in the participant's case file, providing evidence based on real-time labor market information for identifying in-demand occupations.

#### **A. ITA Payments**

- i. Payments from an ITA may be made in a variety of ways including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods.
- ii. Payments may also be made incrementally through payment of a portion of the costs at different points in the training course.
- iii. All ITAs are subject to approval by Program Management.

## **B. ITA Limitations**

- i. The amount and duration of each participant's ITA must be justified based on the participant's needs as identified in the IEP and maintained in the participant's case file such as the occupational choice or goal and level of training needed to succeed in that goal.
- ii. Eligible participants may select any approved training program from the ETPL, but the ITA may not exceed 24 months in total.
- iii. The IEP and associated case notes must clearly identify the start and targeted end date of the ITA and program of study.
- iv. The Southeastern Arizona Local Workforce Development Board will establish a dollar amount limit of \$3,500 per participant for ITAs. Funding ceilings may be adjusted with approval of the Executive Director.
  - a. On a limited case-by-case basis, Career Advisors may request approval above the established limit in 410(B)(iii). Approvals must be justified in writing and based on such factors as alignment with in-demand occupations available in the service delivery area. All requests for this exception must be approved by the Program Manager.
  - b. An individual may select a training program that costs more than the maximum amount available for ITAs when other sources of funds are available to supplement the ITA (e.g. Pell Grants, scholarships, etc.)
- v. The ITA amount may not exceed the total cost that is listed on the ETPL.



SOUTHEASTERN ARIZONA

**SOUTHEASTERN ARIZONA WORKFORCE DEVELOPMENT BOARD**

**Minutes**

**Cochise College Downtown Center**  
2600 E. Wilcox Drive, Room A102  
Sierra Vista, AZ 85635

**Zoom Online Virtual Meeting**

<https://us02web.zoom.us/j/2259468635?pwd=VDJreWw5THlybzZvcllBSXVxR3VJUT09>

**Meeting ID: 225 946 8635**

**Password: qf8PWT**

**Thursday, December 17, 2020**

**10:00 AM**

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**Members Present**

Ron Curtis  
Kathleen Bullock  
Doris Tolbert  
Wick Lewis  
Jack Bauer  
Jason Bowling  
Jelensky Irons  
Evonne Cummins  
Brad Dale  
Elizabeth Kinder  
Edward Dummit  
Sam Curtis  
Amanda Baillie (*Ex Officio*)

**Members Absent**

Matt Bolinger  
Tony Boone  
Mark Gallego  
Merritt Essig  
Janice Lawhorn  
Martha Lujan  
Jacob Williams

**Guests Present**

Jim Mize  
Suzette Diaz  
Dr. Susan Wood

**Staff Present**

Vada Phelps  
Vickie Simmons  
Megan Hollingsworth

**A. Call to Order**

President Ron Curtis called to order the regular meeting of the ARIZONA@WORK Local Workforce Board at 10:00 AM on December 17, 2020 in person as well as on Zoom online website.

**B. Roll Call**

Megan Hollingsworth conducted roll call. The names of present and absent members; as well as guests and staff are listed above. Quorum was established.

*"If such a conflict does arise, I will declare that conflict before the board and refrain from discussing and voting on matters in which I have conflict."*

**C. Welcome New Board Members**

New Board Member, Sam Curtis, was welcomed and introduced himself.

**D. Action Item: To Approve September 17, 2020 Minutes**

**Motion to Approve:** Jack Bauer

**Seconded:** Wick Lewis

**Approved:** Unanimously

**E. Action Item: To Approve 2020-2023 Local Plan**

Vickie Simmons shared that the Local Plan has been approved by the Arizona Workforce Council, as well as the Board of Supervisors. Treasurer, Wick Lewis, asked if anything of concern had come to Vickie's attention while compiling the report. Vickie explained that the purpose of the Local Plan is to serve as a strategic plan for the Board. It identifies the key industries that have been chosen and how staff will serve the clients of Cochise, Graham and Greenlee Counties.

**Motion to Approve:** Doris Tolbert

**Seconded:** Kathleen Bullock

**Approved:** Unanimous

The Board voted unanimously to Approve the 2020-2023 Local Plan.

**F. Action Item: To Approve One-Stop System MOU**

Vickie Simmons explained that the Memorandum of Understanding (MOU) is an agreement between the Board and Core Partners about how to collaborate and serve clients together. The plan has been completed and signed off by all Partners. She also explained that it is a four-year plan that can be looked at twice a year. Executive Director, Vada Phelps, also added that the MOU has been approved by the Cochise County Board of Supervisors.

**Motion to Approve:** Wick Lewis

**Seconded:** Doris Tolbert

**Approved:** Unanimously

The Board voted unanimously to Approve the One-Stop System MOU.

**G. Action Item: To Approve 7/2020-12/2020 IFA & 1/2021-6/2023 IFA**

Vickie Simmons explained that there are two Infrastructure Funding Agreements (IFA) due to the fact the Department of Economic Security (DES) has not changed their offices in the Comprehensive Center. DES will be giving up some offices, beginning January 2021, as they move to virtual services. She also explained that the purpose of an IFA is to show what co-



located partners will pay for infrastructure costs. This is based on a percentage of full-time equivalents.

**Motion to Approve:** Wick Lewis

**Seconded:** Doris Tolbert

**Approved:** Unanimously

The Board voted unanimously to Approve the 7/2020-12/2020 IFA and the 1/2021-6/2023 IFA.

**H. Action Item: To Approve PYQ Youth Contract**

Vickie Simmons shared that the Youth Contract is in Cochise County with Professional Youth Quest (PYQ). She explained that the contract went up for bid, and PYQ was the sole bidder. She added that PYQ has exceeded all performance measures. Wick Lewis asked whether or not PYQ provides youth services to other counties or Local Workforce Boards. Vickie responded by sharing that PYQ only serves Cochise County, and there were no bidders in Graham and Greenlee Counties. Due to this, Graham and Greenlee Counties conduct youth services in-house, rather than contracting out the service.

**Motion to Approve:** Wick Lewis

**Seconded:** Doris Tolbert

**Approved:** Unanimously

The Board voted unanimously to Approve the PYQ Youth Contract.

**I. Action Item: To Approve Training Services Policy**

Vickie Simmons shared that the Training Services Policy is a requirement of the Board to be recertified. She explained that the Workforce staff has continually had a training services procedure, but the Board is required to have a Training Services Policy that details how staff and the Board will serve clients.

**Motion to Approve:** Jack Bauer

**Seconded:** Elizabeth Kinder

**Approved:** Unanimously

The Board voted unanimously to Approve the Training Services Policy.

**J. Action Item: To Approve Revised By-Laws**

Executive Director, Vada Phelps, explained that several changes and additions were made to the By-Laws, in order to comply with new State requirements. She shared, in detail, what each of the changes were.

**Motion to Approve:** Jack Bauer

**Seconded:** Doris Tolbert

**Approved:** Unanimously

The Board voted unanimously to Approve the Revised By-Laws.

**K. Action Item: To Approve Shared Governance Agreement**

Vada Phelps explained that the Shared Governance Agreement outlines how the Local Workforce Development Board (LWDB) and Boards of Supervisors work together. She shared that prior to the ARIZONA@WORK board meeting, it had been approved by the Cochise County

Board of Supervisors, the Greenlee County Board of Supervisors, and is awaiting approval by the Graham Board of Supervisors at their next board meeting. Board President, Ron Curtis, explained that a vote to approve signifies that the LWDB authorizes that they will not do anything that the three Boards of Supervisors would object to. Vada Phelps added that this agreement has always been in place, but it has recently been revised to meet current State requirements.

**Motion to Approve:** Sam Curtis

**Seconded:** Jack Bauer

**Approved:** Unanimously

The Board voted unanimously to Approve the Shared Governance Agreement.

**L. Action Item: To Approve Consortia Agreement**

Vada Phelps explained that the Consortia Agreement is the agreement that indicates that Cochise County Board of Supervisors has been designated as the lead county, authorizing them to sign on behalf of Greenlee and Graham Counties. She shared that prior to the ARIZONA@WORK board meeting, it had been approved by the Cochise County Board of Supervisors, the Greenlee County Board of Supervisors, and is awaiting approval by the Graham Board of Supervisors at their next board meeting.

**Motion to Approve:** Doris Tolbert

**Seconded:** Wick Lewis

**Approved:** Unanimously

The Board voted unanimously to Approve the Consortia Agreement.

**M. Action Item: To Approve Conflict of Interest Policy**

Vada Phelps shared that there has always been a Conflict of Interest Policy, but it has not needed to be approved by the Board until now, due to new State requirements. Ron Curtis explained that the policy outlines and identifies what constitutes a conflict of interest. Vickie Simmons added that the Conflict of Interest Policy matches what is outlined in the Shared Governance and Consortia Agreements.

**Motion to Approve:** Jack Bauer

**Seconded:** Kathleen Bullock

**Approved:** Unanimously

The Board voted unanimously to Approve the Conflict of Interest Policy.

**N. Action Item: To Approve 2020 Budget**

Vada Phelps explained that the budget now has to be formally approved by the Board. She shared that the budget indicated an increase in funding. Secretary, Doris Tolbert, asked why an increase in funds had been received. Vada explained that she believes it was due to the unemployment rates of the three counties.

**Motion to Approve:** Wick Lewis

**Seconded:** Sam Curtis

**Approved:** Unanimously

The Board voted unanimously to approve the 2020 Budget.

## **O. Financial Report: 2020 Budget and Expenditures**

In Michelle Huff's absence, Vada Phelps presented the Financial Report. Report was accepted.

## **P. One-Stop Operator Report**

Presented by Jim Mize. He reported that he has consistently been in contact with Vickie Simmons about how to get all of the agencies together. He shared that it has been a struggle to get people involved in meeting, due to illness or prior commitments. The hope is to get all of the agencies involved in attending these meetings. The plan moving into 2021 is to schedule meetings every two months, with the hope of eventually catching everyone. He added that he believes they should have a good idea of what they are trying to accomplish by the March 2021 LWDB meeting.

## **Q. Core Partner Reports**

- One-Stop Employment and Training report presented by Vickie Simmons.
  - She reported that they have worked with Pima, Santa Cruz, and Yuma Counties on two H-1B proposals. If these proposals are awarded, it would bring in an extra \$1.4 million for health care and information technology careers. She added that they are also going to Eastern Arizona College (EAC) once a week to meet with students. The first time, they met 25 students and gave out 16 applications. This engagement has begun as a result of a meeting with Dr. Susan Wood and other staff members from EAC. Dr. Susan Wood commended Lisa Lane for her work with the EAC students, as well as commending Vickie for her leadership.
- Rehabilitation Services report presented by Elizabeth Kinder.
  - She reported that she has successfully filled counselor positions in the Sierra Vista and Douglas offices. She also introduced Suzette Diaz as the new supervisor for the Safford and Benson Vocational Rehabilitation offices. Elizabeth noted that they are successful at getting people into employment opportunities, but they need to find out what is happening once people are in those opportunities and how to best secure more closures.
- Employment Services report presented by Jelensky Irons.
  - Vada Phelps asked for an update on how DES is providing virtual services. Jelensky explained that the offices are still open, but the services being provided within the offices are virtual. Vickie Simmons commented on how the ARIZONA@WORK offices are also helping people access DES services by providing them a computer to use and getting them in touch with unemployment services. Vada Phelps expressed appreciation to Jelensky about the improvements in DES's services.
- Adult Education report presented by Brad Dale.
  - He shared that they just learned they will be awarded a one time disbursement of \$50,000 to specifically target barriers related to COVID-19. The plan is to use those funds to aid in the purchase of hotspots and laptops to counteract the issues of lack of devices and internet connectivity that many students are facing.

He stated that although the data is low, they are retaining current students and still have measurable skill gains. Vada Phelps commended Brad for a job well done on laying the groundwork for how Cochise College and ARIZONA@WORK can best collaborate.

**R. Executive Director's Report**

Executive Director, Vada Phelps, informed the Board that there are hard copies of the 2019-2020 Annual Report for all members. She highlighted the fact that Southeastern Arizona and Pima County were all "Green" on the red and green performance chart. She also posed the question of whether or not the Board would be interested in a smaller and more condensed version of the report in the future. This is a topic that she would like to discuss more in-depth at the 2021 Annual Retreat. She also thanked Jason Bowling for allowing the Board to borrow SSVEC's Meeting OWL at the Annual Retreat in September 2020.

**S. President's Report**

Board President, Ron Curtis, gave an update on efforts that had been made toward making broadband available to residents in rural areas. He thanked Jason Bowling for providing him the results of a SSVEC survey on internet carriers. He expressed frustration about the resistance that private carriers have shown in either meeting or trying to provide internet to underserved populations. He will continue efforts with those he has already met with and provide updates to the Board at the next meeting.

Ron opened up time for a round table discussion about the local employment situations. He posed questions of how well people are getting jobs, how training and education are going, are there opportunities, and is there more that the Board can be doing?

Board members and guests Amanda Baillie, Susan Wood, Kathleen Bullock, Jason Bowling, Jack Bauer, Brad Dale, Sam Curtis, Wick Lewis, and Doris Tolbert provided valuable discussion and insight as to how the Board can best serve the community.

Ron Curtis encouraged all Board members to stay in tune with what is going on in their communities, so they can best serve those people. He also thanked the Board for all of their work and efforts.

**T. Next Meeting**

Thursday, March 18, 2020  
10:00 AM  
Arizona Electric Power Cooperative  
1000 Arizona 80, Benson, AZ 85602

**U. Adjourn**

President Ron Curtis adjourned the meeting at 12:00 PM.

**ARIZONA@WORK is an Equal Opportunity employer/program.**

**Funded by WIOA federal dollars serving Adults, Youth, and Dislocated Workers**

**Report Submitted by:** *Megan Hollingsworth*