
 <p>ARIZONA @ WORK™</p> <p>Innovative Workforce Solutions</p> <p>A proud partner of the  network</p>	Subject Training Policy Yuma County	
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	Authorized by: Patricia Ray, Operations Director	

Adult~Dislocated Worker~Youth: Individualized & Training Policy

Purpose: This policy for the Yuma County Local Workforce Development Area (LWDA) on providing Individualized and Training Services to Adult, Dislocated Worker and Youth under the Workforce Innovation and Opportunity Act (WIOA). Individuals provided training services funded by Title I-B must be registered and determined eligible and in need of additional assistance beyond career services to obtain or retain employment. Training services prepare the individual for the workforce by providing in demand skills that meet employers' needs based on labor market information. Training services offered using Title I-B funding must be directly linked to in-demand industry sectors and occupations.

WIOA Title I-B is designed to increase participant access to individualize and training services to assist individuals to enter the workforce and retain employment.

Monitored by: Operations Director, EO & Compliance Manager and Compliance Staff.

Definitions: For the purposes of this guidance, the following definitions will apply:

Adult – An individual who is age 18 or older.

Dislocated Worker- An individual who has been laid off or has received notice of termination from employment, are self-employed, but unemployed due to general economic conditions, are the spouse of a member of the Armed Forces on active duty who is unemployed due to relocation for permanent duty reassignment, or are a displaced homemaker.

Youth- Youth age 16 to 24, that may be low income and who face significant barriers to education and employment.

Displaced Homemaker- An individual who has been providing unpaid services to family members in the home and who has been dependent on the income of a another family member but is no longer supported by that income, and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Basic Skills Deficient- An individual (youth or adult) that has English reading, writing, or computing skills at or below the 8th grade level (8.9) or lower level. It is expected that basic skills deficient status will be determined utilizing an objective, valid and reliable assessment, such as the Test of Adult Basic Education (TABE).

Individualized Employment Plan/Individual Service Strategy (IEP/ISS): A plan jointly developed by the participant and the career specialist regarding the ongoing strategies that will be utilized to identify employment goals, achievement objectives, and any combination of activities and services utilized to serve individuals by coordinating services to help the individual overcome barriers and obtain goals and achievements.

Eligible Training Provider List- (ETPL) Training provided to eligible Adult and Dislocated Workers must be procured from the ETPL.

Veteran- An individual who served in the active military, naval or air service, who was discharged or released from such service under conditions other than dishonorable, which may include National Guard or Reserve personnel;

Spouse of a Veteran/Eligible Spouse- The spouse of any of the following individuals: Any veteran who;

1. Died of a service connected disability
2. Has a total disability resulting from a service-connected disability
3. Died while a disability so evaluated was in existence
4. Any member of the Armed Forces serving on active duty who, at the time of her application for assistance under this section, is listed, pursuant to section 556 of title 37 and regulations issued by the Secretary concerned, in one or more of the following categories and has been so listed for a total of more than 90 days.
5. Missing in action, captured in the line of duty by a hostile force, or forcibly detained or interned in line of duty by a foreign government or power.

Incumbent Worker Training- Training that can be used to avert a layoff or employee or to increase the skill levels of employees so they can be promoted within the company and create backfill positions and opportunities for the employers. Employers pay for a significant amount for the cost of the training and along with the approved training program under WIOA.

On-The-Job-Training- Training that is provided by a private, private-non-profit or public sector employer to a participant. During the training, the participant is engaged in productive work in a job for which he or she is paid, and the training provides the knowledge or skills essential to the full and adequate performance of the job. The participants training is provided structured setting, under appropriate supervision, gaining knowledge of the job and acquiring and applying occupational skills while performing on the job. The employer is reimbursed a designated amount based on agreed upon contractual amount.

Transitional Jobs- Time limited work experiences/internships that are incentive/subsidized (up to 100%) and in the public, private or non-profit sectors for individuals with barriers to employment who are chronically unemployed, long-term unemployed or have an employment gap that affects their ability to obtain employment and/or have an inconsistent work history. This definition also encourages the use of transitional jobs with ex-offenders and individuals who are currently receiving or have exhausted TANF benefits and are combined with comprehensive employment and supportive services that are designed to assist in establishing work history that leads to self-sufficiency.

Co-Enrollment- Co-enrollment into one or more partner program con-currently.

Individual Training Account (ITA)- ITAs must be used for all occupational training options that require use of the ETPL. ITAs are established with a specific dollar amount and used to provide training services to eligible WIOA Adult or dislocated worker participants through the One-Stop delivery system and the Contracted Service Provider based on needs identified in the IEP. Each training requires an individual and separate ITA.

Skills Training (Youth)- Skill Training must be used for all youth trainings options. Skill trainings are established with a specific dollar amount and used to provide training services to eligible WIOA Youth based on the needs identified in the ISS. The skill training is an agreement between the contract service and training provider.

Reference(s):

Federal Register: 20 CFR 680.200, Subpart-B
<https://ecfr.io/Title-20/pt20.4.680#sp20.4.680.b>

Federal Register: 20 CFR 680.310, 320
<https://www.law.cornell.edu/cfr/text/20/680.320>
<https://www.law.cornell.edu/cfr/text/20/680.310>

WIOA Section: 134: (c)(3)(a)through (k)

TEGL 3-15, 19-16: Guidance on Services provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act.

https://wdr.doleta.gov/directives/attach/TEGL/TEGL_03-15.pdf

https://wdr.doleta.gov/directives/attach/TEGL/TEGL_19-16.pdf

TEGL 10-09: Priority of Service for Veterans and Eligible Spouses.

<https://wdr.doleta.gov/directives/attach/TEGL/TEGL10-09.pdf>

WIOA Policy Manual: Section 100

https://des.az.gov/sites/default/files/media/adultdislocatedworkerpolicy2916_0.pdf

WIOA Policy Manual: Section 200

https://des.az.gov/sites/default/files/media/youthpolicy11_16_17.pdf

WIOA Policy Manual: Section 500

https://des.az.gov/sites/default/files/media/trainingservicespolicy_final.pdf

WIOA Policy Manual: Section 600

https://des.az.gov/sites/default/files/media/etpl_policy_final10_3_16.pdf

LWDB Policy:

Supportive Services Policy-Yuma County

Policy:

Comprehensive/Specialized & Objective Assessment:

Adult, and Dislocated Workers assessment must be provided prior to other individualized career services and training services as the result are used to confirm if an individual is basic skills deficient, which in turn is used to determine the participant's priority of service. Once the comprehensive assessment is completed, other individualized career and training services may be provided.

Youth assessment may be used to provide design framework services prior to eligibility determination. Objective assessment must include a review of basic skills, occupational skills, prior work history, employability, interests, and development needs.

Priority of Service:

1. ***Veteran's Priority of Service*** will be applied to all Veterans and Eligible Spouses over non-covered persons for receipt of employment and training and placement services as described in TEGL #10-09.
2. ***Adult Priority of service*** will be applied to recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient as described in the WIOA Policy Manual, Section 100.

Individualized Services:

Individualized career services must be made available to eligible Adults and Dislocated Workers accessing the one-stop delivery system in each LWDA when a LWDA determines additional services beyond basic career services are required to obtain or retain employment; however, not all individuals will receive all services. Adults and Dislocated Workers must be enrolled in order to receive individualized career services, and LWDA's must collect documentation for priority of service for adults enrolled in the Adult and Dislocated Worker program.

Employment Plan (IEP/ISS):

The Individual Employment Plan (IEP) or Individual Service Strategy (ISS) must be developed based on the assessment, employment goal, and appropriate achievement objectives that are need to assist the participant in meeting his/her educational and career goals. The IEP/ISS is a living document and must be updated every 90 days with each contact to reflect progress, program status, and changes. All services provided to a client must be entered on the IEP/ISS, AJC Service & Training, and program notes in AJC, and must be updated whenever there is a change made.

Training Services:

Training services are available to assist Adult, Dislocated Workers and Youth in gaining skills and knowledge to obtain and retain employment. Training is administered by public and private sector employers, as well as institutions of higher education. Training services must be in in-demand industries and occupations to assist individuals to enter the workforce. Prior to providing training services, staff must receive an interview, assessment or evaluation, and career planning, including the development of an IEP/ISS. Individuals that do not meet the criteria for training will be provided various types of career and employment services, which may include referrals to partner agencies that may be able to provide training.

Training Services Eligibility:

Adults, Dislocated Workers, and Youth must be registered and enrolled in the Arizona Job Connection (AJC) and determined eligible prior to receiving training services. Training services are available to employed and unemployed adults, dislocated workers, and youth:

- A. The Contracted Service Provider will determine, after an interview, evaluation or assessment that the participant is:
1. Unlikely or unable to attain or retain employment that leads to economic self-sufficiency or wages comparable to or higher from previous employment through career services;
 2. In need of training to obtain or retain employment that leads to economic self-sufficiency, or wages comparable or higher to wages from previous employment;
 3. Determined to have the skills and qualifications to successfully participate in training services;
 4. Selecting a program of training services that is directly linked to employment opportunities in the local area or the planning region, or in another area to which the individual are willing to commute or relocate;
 5. Determined eligible according to the state and local priority of service system for the Adult and Dislocated Worker program;
 6. Individuals will meet with staff to identify career choices, attend workshops, and begin active job search activities. Individual interested in occupational training will be asked to complete and submit a Federal Pell Grant at that time;
 7. Unable to obtain grant assistance from other sources to pay for the cost of training or require Title I-B assistance in addition to other sources of grant assistance (WIOA Policy Manual, Section 500);
 8. Adult and Dislocated Workers receiving training services when determined appropriate, must be provided either through an Individual Training Account (ITA) or through a training contract;
 9. Youth receiving training services must be provided through Skills Training.

The training cost cap for Yuma County will not exceed the approved amount of \$5,500.00, except in the instance of a specialized or technical program need that is approved by the LWDB Operations Director or Executive Director.

ITAs & Skills Training:

ITAs & Skills Training must be used to provide training services and are used to establish a specific dollar amount for eligible Adult, Dislocated Worker or Youth. It must be justified through documentation of the participants need, such as occupational choice, goal and the level of training need to succeed in that goal, as identified in the IEP/ISS. Each training requires an individual and separate ITA or Skill Training, which must contain, but is not limited to:

1. Cost of the program to include tuition, supplies, books, fees, dollar amount of any additional sources of funds being utilized from other programs that are applied to the training program;
2. Duration of the plan;
3. Signatures from the Contract Service Provider and participant;
4. The ITA amount cannot exceed the total cost listed on the ETPL.
5. Assessments (IEP/ISS) to document the participant's ability to complete the training; and
6. Labor market information that is relevant to the training to document the reasonable expectation of high-pay/high demand employment upon completion of the training, must be in a sector strategy area;
7. Pell grant eligibility and the award amount that will be applied to the training cost;
8. ITAs can be used to support pre-apprenticeship training, tuition, supportive services and needs related payments. (Supportive Services Policy-Yuma County);
9. Note that a 3rd party billing form may be used to procure training services at the community college level.

ITA & Skills Training Limitations/Payments:

The amount and duration of each ITA or Skills Training must be justified through documentation in the IEP/ISS. Training services should be implemented in a manner that maximizes consumer choice.

1. LWDB may impose a dollar amount.
2. Exceptions to the limitations on the ITA or Skills Training must be determined on a case-by-case basis by the LWDB Operations Director or Executive Director.
3. Payment for the ITA or Skills Training is made by submitting an invoice.
4. Service providers must ensure that Title I-B funds are utilized only when no other sources of funding are available or the amount available is insufficient in covering the participants training costs. (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 Title I-B training funds).
5. Student loans are excluded when determining the individuals overall need for Title I-B funds for educational costs.
6. Individuals may be attending school when they become a Title I-B participant; reimbursement of training costs is **not allowed** for payments made prior to Title I-B participation.

7. Other types of approved training under Title I-B may be provided under a contract for services with an employer in one of the following:

Application for the Pell Grant:

Contracted Service Provider must maintain documentation in the electronic participants file to support the eligibility determination and award of the Pell Grant.

1. All Title I-B program participants pursuing training at a Pell Grant eligible institution must apply for a Federal Pell Grant. A participant may enroll in Title I-B 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 service provider the amount that the Pell Grant covers from the Title I-B funds used to underwrite the training.
2. The Contracted Service Provider must have a completed agreement on file with the educational institution and the Title I-B participant before any funds are paid to the training provider. This agreement must detail the amount to be initially paid by the contract service provider and the agreement between the training provider and the participant to reimburse Title I-B through the Federal Pell Grant.
3. The Contracted Service Providers will need to develop their own internal process for reimbursement and submit to the LWDA for approval.
4. Federal Pell Grants are awarded to cover the tuition costs and education related expenses, but only the amount of the grant that applies to the participants' tuition will be used to reimburse expended Title I-B funds.

Training services must be linked to in demand industry sectors and in-demand employment opportunities in the local area or planning region or in a geographic area in which the individual is willing to relocate or to commute to. Training services must be documented in the IEP/ISS.

Examples of Training Services may include (WIOA Policy Manual, Section 500):

- a.) **Occupational Skills Training-** Organized program of study that provides specific vocational skills that lead to proficiency in performing tasks and technical functions required by a certain occupation fields at entry, intermediate or advanced levels of employment. This training includes training for nontraditional employment. Providers of occupational skills training must be listed on the Eligible Training Provider List (ETPL) and the specific training program must be listed as Title I-B approved for adults and dislocated workers. (WIOA Policy Manual, Section 600).
- b.) **On-The-Job training (OJT)-** Training provided under a contract with an employer who is reimbursed a percentage of the wage rate of the participant being trained while engaged in productive work in a job to help them prepare for long term unsubsidized employment. Yuma County will contract with neighboring states to provide OJT training; this will be considered on a case by case basis and approval by Administration.
 1. Yuma County's policy is to provide up to 50% of the wage rate of an OJT.
 2. OJT duration is based on academic skill, identified training need, prior work experience, position training required and the wage amount to be reimbursed.
 3. OJT can be provided to eligible existing workers if; the employee is not earning a self-sufficient wage, the employee needs to learn new technologies, production and/or service procedures, upgrading to new job duties that include the need to increase workplace literacy.
 4. OJT may be written for Registered Apprenticeship programs or participating employers in a Registered Apprenticeship program to

cover the on-the-job training portion. ITAs can also be combined with OJT and must be consistent with the WIOA Policy Manual, Section 500 for existing workers.

5. Occupation in demand

- c.) **Work Experience/Internships-** A structured Work Experience activity/contract, paid or unpaid, that promotes a youth, adult and dislocated worker with opportunities for work and career exploration. WEX/Internship is not *considered training*, but is allowable as an individualized career service for adults and dislocated workers.
1. This activity can be conducted in the private, nonprofit and public sector within Yuma County and provides the youth with the opportunity to develop basic occupational related skills.
 2. Work experience is not designed to replace an employee.
 3. Work experience will not exceed 560 hours and is usually between 6 to 14 weeks in duration.
 4. Work experience does not need to result in permanent employment or an occupational credential.
 5. Work experience activity must be documented in the IEP/ISS and AJC program notes.
 6. The duties listed on the contract should expose the individual to and/or prepare them for postsecondary education and/or entry into a demand occupation in Yuma County, or target industry.
 7. Work experience for Youth must have an academic and occupational component that includes contextual learning and is intended to help the participant learn information necessary to work in specific occupation
 8. WEX/Internship is not a credential activity. It is recommended that the employer provide a certificate of completion to acknowledge the successful completion of the WEX/Internship.
- d.) **Customized Training-** Training designed for the specific requirement 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 local board, upon completion of the training the employer must commit to employ or continue to employ the individual(s) who participated in the training).
- e.) **Incumbent Worker Training-** Training designed to help the local areas employer's workforce obtain the skills necessary to retrain employment and prevent job loss.
- f.) **Registered Apprenticeship-** Training provided 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.
- g.) **Transitional Jobs-** Transitional jobs are time-limited subsidized work experiences which include comprehensive employment and supportive services that are designed to establish work history, demonstrate success in the workplace and develop skills that lead to entry and retention in unsubsidized employment.
- h.) **Job Readiness Training-**(if offered in conjunction with)
1. Occupational skill training;
 2. On-the-job Training;
 3. Incumbent worker training;
 4. Programs that combine workplace training with related instruction;
 5. Skill upgrading and retraining; or
 6. Entrepreneurial Training

- i.) **Adult Education and Literacy**-Adult Education and Literacy activities include English Language Acquisition and integrated education training programs, provided concurrently or in combination with:
 - 1. Occupational skills training;
 - 2. On-the-job training;
 - 3. Incumbent worker training;
 - 4. Programs that combine workplace training with related instruction; or
 - 5. Skill upgrading and retraining
- j.) **Skill Upgrading and Retraining**- A short term or part-time training designed to upgrade skills in the workplace and provide retraining to enhance current skills. Skill upgrading and training programs must be listed on the ETPL.
- k.) **Entrepreneurial Training**- Training on the responsibilities of organizing, managing and operating a business.
- l.) **Work-Based Training**- Includes on-the-job training, registered apprenticeship, incumbent worker training and customized training. Work-Based training is not subject to ETPL requirements except for Registered Apprenticeships.

Note: Approved training under Title I-B may be provided under a contract for services in one of the following:

- 1. OJT
- 2. Customized Training
- 3. Incumbent Worker Training
- 4. Traditional Jobs
- 5. Classroom Size Training

Programs that combine Adult Ed. and Literacy Activities with Occupational Skills Training, and Skill Upgrading must be listed on the Eligible Training Provider List (ETPL) for adults and dislocated workers. Only the Occupational Skills Training, Registered Apprenticeship, or Skill Upgrading and Retraining component of the training must meet ETPL performance criteria.

Required:

The electronic case file and AJC must contain a determination of the need for all training services as described above as determined through the interview, assessment, and career planning activities and should also include career planning documentation; to include AJC training provider program detail information and the provision of labor market information provided to the participant and any training provider performance data available. In cases of co-enrollments with partner programs any co-case management or supportive services provided must be documented in AJC and case noted accordingly.

Coordination of Title I-B training funds with other grants should be documented accordingly in participant file. Priority of services applied to the individual must also be documented when determining the need for training services. Veterans and eligible spouse documentation should be collected to verify status and placed in file.

Service and Training Plan in AJC:

All services provided to participants must be added to the Service & Training plan within 15 calendar days in AJC. When staff enter a training service, the appropriate O*net code and CIP code is required. The Adults and Dislocated Worker program will use the ETPL provider link to default the training program under the Service & Training plan in AJC. Educational CIP codes are based on the program of study and can be located at: <https://nces.ed.gov/ipeds/cipcode>

Employer Information Form:

An employer interview must be conducted prior to placing the participant at the worksite to determine if the setting is appropriate. When meeting with the employer, an Employer Information form must be completed. This form asks questions that pertain to Title I-B requirements. The department manager must sign off on the form, approving the training site. The completed Employer Information form along with the following documents must be forward to the Compliance Department:

1. Business License
2. Arizona Corporate Commission or BBB Report (Better Business Bureau)
3. Company Website Printout (if applicable)
4. Problem Resolution Procedure from Employer (if applicable)
5. Workers Compensation (OJT only)

Note: To determine if the employer is operating legally and is complying with city or county requirements the employer must provide copies of the following documents listed above (#1, #2, and #3). The Federal Employer Identification Number (FEIN) provided on the Employer Information form will only be required and acceptable for those employers operating in the Yuma County area that may not be required to have a business license. However, the documents listed above (#2 and #3) are still required.