

## WIB of SWMO Individual Training Account Policy

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### **WIOA Classroom Training Local Policy/Identify the funding limit for Individual Training Accounts (ITAs)**

Funding limit for all ITA's is \$5,000 per program year, up to two program years. The SW WIB requires participants to apply for **Pell Grants**, scholarships and other funding sources prior to utilizing WIOA funds. Certification programs that are non-transferable/noncredit hours are only eligible for a onetime payment of up to \$5,000. The program must be provided in high-demand (Meric Grade B or above), WIB targeted industry and the training provider must be listed on the ETPL.

In instances where similar training is available through a variety of institutions, programs offered at the least cost will be utilized. An assessment by the Career Center or training provider must be taken prior to training approval. When training has been determined as an appropriate service, the training provider has been identified and funding has been obligated, the customer will be informed of the dollar amount available for their WIOA ITA.

The goal of tuition assistance is to ensure that the cost of the training program is paid through a variety of resources. When possible and appropriate, dual enrollment is a requirement to maximize training dollars. Per DWD Issuance 15-2012 - Dual Enrollment Policy requires that dislocated workers who request re-employment services, and are eligible for or may become eligible for funds available through a DWG, and/or Trade Act, must also be enrolled in the WIOA Dislocated Worker program. Individual Employment Plans should be written to accommodate the additional funding sources available through the DWG and/or the Trade Act. Collaboration between the different funding sources must be obtained to ensure all services available to the participant are utilized.”

Priorities for WIOA Adult Title 1 training services are to be given to Veterans and recipients of public assistance. If the individual is receiving cash assistance (Temporary Assistance – TA) the WIOA Adult Title 1 program operator ensures that the participant is enrolled in the Missouri Work Assistance Program (MWA) to maximize dollars available for training prior to consideration for assistance with WIOA Adult Title 1. Focus on determination of funding is based on the needs of the participant. Assistance for training is limited to tuition, fees, books, and other instructional materials and supplies. Each request is handled on a case by case basis.

Emphasis will be placed on providing vocational education in the “Key Industry Clusters” that have been identified in the Southwest Region WIB. Key Industry Clusters in the Southwest Region have been identified as Advanced Manufacturing, Health Care, Construction, Information Technology, Transportation, Energy/Utilities, Green Occupations, Customer Service and Other Occupations (fast track, teaching and apprenticeship training).

In cases where a WIOA Adult or Dislocated Worker Basic level program participant is determined to be in need of Individualized and/or Training services, staff must create an Actual Enrollment in MoJobs by completing the Application, Eligibility, Enrollment and Employment Plan sections of the system.

### **Age, Social Security Number, and Citizenship:**

If the WIOA Adult enrollment included Missouri Driver License or Non-Driver License documentation of Date of Birth, this is considered Ideal documentation, and no further documentation is required for these elements.

Veteran Status: To be determined and information put in MoJobs

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## **Selective Service Registration:**

Staff must verify registration (for males born after 1959) on the Selective Service website and record the registration number in Toolbox on the Eligibility screen's Application tab.

## **Complaint & Grievance Rights Notification:**

MoJobs has a page displaying the Complaint and Grievance Rights Notice and customers have to click "I Agree" before they can proceed with registration.

## **One-Stop Operator's Determination of Need for Intensive Services:**

Staff may document this determination by answering "Yes" to the question "Was the customer unable to achieve self-sufficiency after receiving core services?" on the MoJobs Eligibility Application tab.

## **WIOA Adult and Dislocated Worker Training Service Documentation Requirements**

An individual must meet all of these requirements in order to be eligible to receive WIOA funded Training:

- A skills assessment administered by the Job Center or training institution must be completed prior to Training Level Service and case noted. This requirement may be waived by WIB staff if determined unsuitable for the customer, example timeframe – testing schedule and employment start date for an OJT or if ACT testing accommodation requirements do not fit customer's situation.
- Was unable to obtain or retain employment through Career Services.
- Is appropriate for and in need of training.
- Was unable to obtain other grant assistance, or requires assistance beyond other grant assistance programs.
- Has chosen training that is linked to employment opportunity.

## **Either Electronic or Hard Copy files must be used in order to retain any payment-related documents such as:**

- On-the-Job Training or Work Experience records.
- Case note - Classroom Training records (grades, attendance and/or certificate/diploma achieved).
- Supportive Services payment records.
- Needs-related Payments records.
- Records of any other payments made to, or on behalf of, the participant.
- Employment plan must meet guidelines in DWD Issuance 05-2015 and include
- Employment Plan ONET Code to reflect training (Service Note ONET not recognized in MoJobs)
- Goals describe education and career goals
- Justification should reflect need for training to obtain employment
- Activity Code shall reflect current services received
- Selective service information

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## **The MoJobs record should also contain service notes that:**

- Indicating conversation concerning development of Employment Plan.
- Customers progress toward reaching the Employment Plan goals.
- Document need for and the delivery of additional services.
- Document all contacts with the customer.
- Report any new information pertaining to the customer's employability.

## **Initial Service Notes for Training Level to include:**

- Cost of Training, Training Institution, Training Program, Industry Cluster, Duration of Training (completion date) Meric Grade B or above, ONET code (also reflect on IEP), PELL determination and fulltime status. Applicant has read and understands training agreement.

## **Progress Service Notes for Training Level should include:**

- Documentation of satisfactory grades and attendance were seen by Career Center Staff.

## **Files must contain:**

- Release of information form, applicant statement (when applicable).

## **Highlights of the Issuance include:**

- Duplicate payments must be avoided when the customer is eligible for both WIOA and other assistance.
- The mix of funds should meet the needs of the customer and be determined based on the availability of funding for either training costs or Supportive Services so that the training can be completed successfully.
- Simply reducing the amount of WIOA funds by the amount of Pell Grant funds is not permitted.

## **Time Period:**

Training must be completed within two years, with priority on short-term training. Exceptions may be made on a limited basis for locally-defined, high-demand occupations. Such cases will be subject to funding availability.

## **Exception Process:**

The process for ITA exceptions in the SW Region is to provide information to the customer concerning all training opportunities to maximize the customer choice in the selection process and ensure a customer driven system. The Act, at § 134(d)(4)(G)(ii), and the regulations at § 663.430, provide that, under certain limited circumstances, contracts for training rather than ITA's may be used. Specifically, on-the-job training contracts with employers and customized training contracts are authorized. The Act also reads the exceptions to ITA's are to be used infrequently.

## **Contract for Training Services:**

Contracts for training services may be used instead of ITAs only when one or more of the following five exceptions apply, and the local area has fulfilled the consumer choice requirements of § 680.340:

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- When the services provided are on-the-job-training (OJT), customized training, incumbent worker training, or transitional jobs.
- When the Local WDB determines that there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs. The determination process must include a public comment period for interested providers of at least 30 days, and be described in the Local Plan.
- When the Local WDB determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment. The Local WDB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the individuals with barriers to employment to be served. The criteria may include: (i) Financial stability of the organization; (ii) Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and (iii) How the specific program relates to the workforce investment needs identified in the local plan.
- When the Local WDB determines that it would be most appropriate to contract with an institution of higher education (see WIOA sec. 3(28)) or other provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided that the contract does not limit consumer choice.
- When the Local WDB is considering entering into a Pay-for- Performance contract, and the Local WDB ensures that the contract is consistent with § 683.510 of this chapter and per WIB Fiscal Policy (3.1f) Cost Thresholds

### Cost Thresholds

1. The following cost thresholds will determine the procedure to be followed for procurement:

- \$0 – 3,000 - Requisition completed with Executive Director or designee approval prior to procurement
- \$3,000 - 24,999 - Staff employee must prepare a Written Needs Assessment, secure a minimum of three (3) written bids, and choose a vendor in conjunction with the Executive Director or designee (catalog, email, fax, or internet documentation is permissible)
- \$25,000 or More - WIB must formally advertise through a competitive bidding process as noted in 3.1h