



APPROVED ETLWDB CHAIR:

## SUBJECT: TRAINING POLICY

**POLICY STATEMENT:** Training services are provided to adult, dislocated workers and out-of-school youth who meet the eligibility requirements of the Workforce Innovation and Opportunity Act (WIOA) and who require training to equip them to enter the workforce and retain employment. Training must be directly linked to the in-demand employment opportunities in the local area or in an area in which the adult or dislocated worker is willing to relocate. Decisions on appropriate training tracks should be guided by career pathways that provide, upon successful completion of the training, sustainable wages, as determined by either the Self-Sufficiency policy or the MIT Livable Wage Calculator

**Introduction:** Under the Workforce Innovation and Opportunity Act (WIOA), training services for adults, dislocated workers, and out-of-school youth are primarily provided through Individual Training Accounts (ITAs). The ITA is established on behalf of a registered WIOA participant and is used to purchase training services from an eligible training provider selected in conjunction with a career specialist. Training services such as on-the-job training, registered apprenticeships, pre-apprenticeships and incumbent worker training are approved services under WIOA but do not utilize Individual Training Accounts.

**Purposes:** Training services can be critical to the employment success of many adults, dislocated workers, and out-of-school youth. The purposes of this policy are to ensure that selection of training services is

- conducted in a manner that maximizes customer choice,
- linked to in-demand occupations,
- informed by the performance of relevant training providers, and
- coordinated to the extent possible with other sources of assistance, including Pell Grants.

**Eligible WIOA Customer:** eligible adult, dislocated worker, and youth customers

**Process:** WIOA participants applying for training services should be fully informed of the selected provider's performance, labor market conditions and trends, and additional sources of grant assistance in order to make an informed choice about their training selection.

A. ITAs will be issued to WIOA-registered customers within the following parameters:

- In conjunction with a career specialist, the individual must have completed an Individual Employment Plan (IEP).
- The individual must be determined by assessment, interview, or evaluation to be unable, without training services, to obtain or retain employment that leads to economic self-sufficiency.
- The individual must have the skills and qualifications to successfully complete the selected training program.
- Training must be in an occupation identified by the local LWDA as a growth and/or demand occupation or documentation of employment prospects for areas not identified must be provided.
- All training services are contingent on the availability of funding and the local service level expectations.

- B. A maximum ITA of \$12,000.00 per customer lifetime is established to assist in covering the costs of training and training related expenses. The ETH RA Workforce Services Division director may approve exceptions to the cap. ITAs are funded at state residency rates, no out-of-state tuition fees will be paid. Based on availability of funding, ITA allowable purchases include: books, fees, tuition, tools, uniforms, and other education materials necessary to complete training.
- C. All applicants requesting WIOA services should be informed that it is one of many funding sources that may be available to them. The individual must have applied, with support from the career specialist, for appropriate and applicable sources of financial aid such as Pell Grant, tuition assistance/exemption, Hope Scholarships, TN Promise, TN Reconnect, etc. The customer file should include documentation of the financial aid award by using the notice from financial aid or the participant's self-attestation. The ITA amounts for tuition may not exceed the State of Tennessee residency tuition.
- D. ITAs may not be used for payment of late fees caused by customer error or delay. The customer is responsible for these items, as they are responsible for other fines or penalties.
- E. Short-term training is preferred. Programs should not exceed 104 weeks (two years). Exceptions to this policy may be approved on a case-by-case basis and requests must include evidence that financial support is available during extended training periods. The ETH RA Workforce Services Division director may approve exceptions.
- F. Continuing Education and other similar courses may be allowed only if the following conditions apply:
  - The customer must have a specific occupational goal.
  - The customer has a work history or educational background that relates to the occupational goal.
  - The customer must present evidence as to how the proposed training will increase his/her employment marketability.
- G. Normally, distance learning will be approvable only if other appropriate training is not available at a lower cost within the commuting area. Distance learning is approvable only when it is part of a curriculum that:
  - leads to the completion of a training program; and
  - requires students to interact with instructors; and
  - requires students to take periodic tests; and
  - requires students to come onto campus, or other approved facility, for tests and meetings.
- H. Customers must meet minimum academic standards for continuation of funding.
- I. In general, all training programs must be within a reasonable commute of the LWDA. Training programs not within commuting distance to the LWDA may be approved on a case-by-case basis. All approved training must be located within the contiguous United States.

**Access:**

- A. To ensure equity of access as well as ability to benefit from training, a management-level employee of the career service provider shall review
  - Customer's objective assessment results
  - Customer's Individualized Employment Plan (IEP)
  - Pell grant application status
  - Case notes developed during case-management appointment(s)
  - Customer's financial analysis

- B. The customer must consult with a career specialist routinely to ensure that the customer is making satisfactory progress in training. The training provider will certify the individual's satisfactory progress. If the trainee is not making satisfactory progress each term (quarter/semester/other), the career specialist may either renegotiate a new ITA or de-obligate ITA funds
- C. Contracts for services may be used instead of ITAs only when one or more of the following five exceptions applies:
- If the Local Workforce Development Board determines on-the-job training—which may include paying for the on-the-job training portion of a registered apprenticeship program, customized training, incumbent worker training, or transitional jobs—is feasible, effective, efficient, and appropriate;
  - If the Local Workforce Development Board determines that there are an insufficient number of Eligible Training Providers in the local area to accomplish the purpose of a system of ITAs. This determination process must include a public comment period for interested providers of at least 30 days and must be described in the Local Plan;
  - If engagement of a training services program of demonstrated effectiveness offered in a local area by community-based organization or other private organization to serve individuals with barriers to employment. The Local Workforce Development Board must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to individuals with barriers to employment to be served. The criteria may include:
    - o Financial stability of the organization;
    - o 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
    - o How the specific program relates to the workforce investment needs identified by the local plan;
  - If the Local Workforce Development Board determines that the most appropriate training could be provided by an institution of higher education or other provider of training services in order to facilitate the training of a cohort of multiple individuals for jobs in high demand sectors or occupations, provided that the contract does not limit consumer choice; and/or
  - If the Local Workforce Development Board determines a pay-for performance contract is suitably consistent with WIOA §683.500 (note that no more than 10 percent of the local funds may be spent on pay-for-performance contract strategies as they are defined in section 3(47) of WIOA, and be consistent with 20 CFR 683.510).