

PRINCE GEORGE'S COUNTY LOCAL WORKFORCE DEVELOPMENT BOARD

Training Policy

POLICY NUMBER:	1.4000.100.016
EFFECTIVE:	August 18, 2021
APPROVING AUTHORITY:	Board Chair Prince George's County Local Workforce Development Board
RESPONSIBLE STAFF:	Executive Director, Director, Policy & Compliance
RESPONSIBLE OFFICE:	Office of the President, Employ Prince George's

SUMMARY:

Workforce Innovation and Opportunity Act (WIOA) program is designed to provide employment and training opportunities to those who can benefit from and need such opportunities training services for eligible individuals. This requires local WDBs to ensure that eligible individuals are determined to be appropriate for program enrollment based upon a consistent, equitable assessment relevant to the level of services for which the individuals are applying. Title I-B training services for WIOA eligible adults, dislocated workers, and youth are provided through Individual Training Agreements (ITA). Using ITA funds, Eligible adults, dislocated workers, and youth purchase training services from eligible training providers they select in consultation with service providers.

POLICY:

ITA's are one training option available to eligible and appropriate participants when service providers determine that they will be unlikely or unable to obtain or retain employment, leading to self-sufficiency or higher wages from previous employment through other types of career services alone. An ITA is limited in cost and duration and must result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment. ITAs are allowed for out-of-school youth ages 18-24 (out-of-school youth ages 16-17 are not eligible for ITAs) per WIOA Section 129(c)(2)(D) and Proposed 20 CFR 681.550.

ITA funding for training is limited to participants who:

- Complete an assessment and an IEP/ISS that identifies the selected training course.
- Are unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants to complete their training goals.
- 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.
- In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
- Have the skills and qualifications to participate in the selected program of training services successfully. Selects a program of training services that are directly linked to the employment opportunities in the local area or the planning region, or in another area to which the adults or dislocated workers are willing to commute or relocate; and

PROCESS:

ELIGIBILITY:

Participants must complete an Individual Employment Plan (IEP)/Individual Service Strategy (ISS) that details the participant's skills, interests, and abilities, and sets specific goals for the participant to meet to obtain or retain employment that leads to self-sufficiency. A participant must be actively participating in an ITA program for not less than five (5) class days before they may be considered enrolled in the program for purposes of ITA payments and eligible training provider WIOA performance levels.

ADDITIONAL REQUIREMENTS FOR ADULT-FUNDED ITA'S:

As part of determining the appropriateness for training services, the local area must review "self-sufficiency" for participants seeking a WIOA adult funded ITA. WIOA adult-funded may only be approved for those who have been determined to be below a locally defined standard of "self-sufficiency." This requirement is intended to ensure that adult participants seeking adult-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed to obtain or retain employment.

Additionally, all young adults, ages 18-24, seeking WIOA adult funded ITAs must also be screened for dependency status. If an adult, ages 18-24, is determined to be dependent, "self-sufficiency" would include the income(s) of all family members, including the young adult's parent(s). WIOA eligible adults over the local standard for "self-sufficiency" do not qualify for adult funded ITAs. Other WIOA services may be provided, as appropriate. They may also be served using other WIOA funds if eligible.

DOCUMENTATION PARTICIPANT FILE CASE RECORDS FOR WIOA TITLE 1 PROGRAM:

Service providers must develop an adequate organization system to ensure that the information contained in participant records is well documented, consistent, accessible, and accurate from registration to exit. Supervisors and directors must ensure that all staff document participants progress in the Maryland Workforce Exchange (MWE) and participants' file.

The case files for adult, dislocated worker, and youth participants must contain:

- Assessment results supporting the selected program of study. The assessment must support the need for training, including a determination by a career staff that the participant will be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone; and that the selected program of study will result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment. It is important that WIOA staff gather enough information, by whatever means, to justify the need for training services.
- Completed IEP/ISS documenting the selected program of study, anticipated and actual start/end dates, and training outcomes.
- Verification of FAFSA application and award status, if applicable. Authorization of the ITA and any approved increase or modification.
- Documentation of the participant's progress and/or grades.
- Case notes must tell a story regarding all services that are received.

USE OF PREVIOUS ASSESSMENTS:

When determining the services needed for an individual to obtain or retain employment, the local area or an American Job Center partner shall not be required to complete a new interview, evaluation, or assessment of a participant if the local area or American Job Center partner determines it is appropriate to use a recent interview, evaluation, or assessment (within six (6) months) of the participant conducted pursuant to another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education (ABLE), Veteran Program, or other education or training providers.

PRIORITY FOR ADULT PROGRAM:

TEGL 7-20 specifies that at least 75 percent of State's participants receiving individualized career and training services in the adult program are from the first and second priority. Priority for training services funded by and provided through the adult program shall be given veterans and eligible spouses who are included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient received priority for services with WIOA Adult formula funds for individualized career services and training services. Second for non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula groups.

REPORTING REQUIREMENTS:

Registration is the process of collecting information to support a determination of eligibility. Program participation begins after the registration process of collecting information to support an eligibility determination and begins when the individual receives an individualized career service or training service funded by the adult or dislocated worker program. Service providers shall ensure the timely and accurate reporting of WIOA participants, activities, and performance information using the Maryland Workforce Exchange System (MWE).

MONITORING:

The Board, through its administrative agent, must conduct oversight of the implementation of the WIOA adult, dislocated worker, and youth programs to ensure that participants are enrolled in the programs and have been provided identified services.

Through the State's monitoring system, program monitors will review the local area's implementation of the WIOA adult and dislocated worker programs, including a participant file review, during the annual on-site monitoring review for compliance with federal and State laws and regulations. Any issues will be handled through the State's monitoring resolution process.

TRAINING SERVICES:

Training Services may include:

- Occupational skills training, including training for nontraditional employment.
- On-the-job training.
- Incumbent worker training.
- Programs that combine workplace training with related instruction, which may include cooperative education programs.
- Training programs operated by the private sector.
- Skill upgrading and retraining.
- Entrepreneurial training.
- Transitional jobs.
- Job readiness training.
- Adult education and literacy activities.
- Customized training.

Individual Training Account (ITA):

ITAs may only be issued after the following determinations or activities have taken place:

- The participant has been determined eligible. After an interview, evaluation, or objective assessment, has been determined to need training services and have the skills and qualifications necessary to complete a selected training program.
- It has been determined the participant is unable to obtain financial assistance from other sources to pay for the cost of training, such as Trade Adjustment Assistance, Pell Grants, Welfare to Work Programs, State training funds, or will require financial assistance in addition to the other sources of funds.
- An individual employment plan (IEP) or individual service strategy (ISS) has been jointly developed

between the participant and the Career staff utilizing the interview, evaluation, or objective assessment results. The IEP/ISS must identify the participant's employment goals, the appropriate achievement objectives, the combination of services required to achieve the employment goals, and the program of training selected to directly link the participant to the employment opportunities in the local area. Goals should be established using career interest assessments along with a fully completed objective assessment.

- Individual Training Accounts are established for participants who have been determined eligible for training service and are currently enrolled or will be enrolled in a program of training that can be completed by a full-time student in two years or less.

A program of training is defined as one or more courses or classes or a structured regiment, which upon successful completion, leads to:

- A certificate, an associate degree, a baccalaureate degree or
- The skills or competencies needed for a specific job or jobs, occupation, occupational group, or generally, for many types of jobs or occupations as employers recognize and determine prior to training.
- Participants must maintain at least a 2.0-grade average in graded courses or programs and at least a satisfactory rating in un-graded courses, each quarter/semester/term. If a client has two consecutive quarters/semesters/terms where they fall below a 2.0 GPA, American Job Center approval is required to continue utilizing ITA funds. A client's previously earned grades prior to enrollment in WIOA will not be considered in a participant's maintenance of a cumulative 2.0 GPA.
- Training services provided shall be directly linked to an in-demand industry sector or occupation or a high potential for sustained growth in the local area or planning region or in another area to which an adult or dislocated worker receiving such services is willing to relocate.
- Training services shall only be provided by providers who have met the eligibility criteria and have been identified as being on the list of eligible providers of training services under section 122 of the WIOA. According to 20 CFR 680.530, providers of OJT, customized training, incumbent worker training, internships, paid or unpaid work experiences, or transitional jobs are not subject to the eligibility requirements outlined in section 122 (a)-(f) of WIOA. Still, they are required to provide performance information established by the State.
- Training services shall be provided in a manner that maximizes consumer choice in selecting an eligible provider of such services. Through the American Job Center centers, each local board shall make available the list of eligible providers of training services and accompanying performance information. Based upon the available information, participants, with the assistance of the local area, can make informed customer choices.
- Online training programs may not exceed six months in length.

ITA FUNDING LIMIT:

The limit for ITA contracts is \$4,000. WIOA program managers, or their designees, have the authority to increase the limit of an ITA depending on the participant's need and program budgets. Documentation of the manager's approval authorizing the ITA increase must be included in case notes located in MWE.

The maximum ITA limit is not an entitlement. The amount and duration of each participant's ITA award is determined on an individual basis. Funding amounts will consider the total costs of the selected training program, any other financial assistance available to the participant, and the WIOA funding available to the Adult, Dislocated Worker or Youth Programs.

The ITA funding can only include the cost of training services. An ITA may fund prerequisite training to a vocational training program if it is required by the educational institution. The individual training account may cover the costs of tuition, fees, books, and supplies. The supplies may include protective clothing, tools, or other materials that the training provider specifies as a requirement listed under the training program curriculum. The costs for such supplies should be limited and only be approved for the training period the participant is enrolled in (i.e. semester, quarter, etc.) and not the entire period of training.

ITA CONTINUED FUNDING:

Continued funding of an ITA is contingent on the availability of WIOA funds and on the participant's satisfactory progress in school. Career staff will review the participant's training progress and expenses quarterly or more frequently, depending on the training institution's schedule. An individual's progress will be considered satisfactory upon earning:

- A grade point average that does not fall below 2.0 for two consecutive terms: or
- A grade point average sufficient to graduate from, or receive certification in, the individual's approved area of study; or
- Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.
- In the case of self-paced or ungraded learning programs, satisfactory progress means participating in classes and passing certification examinations within the timeframe established under the approved training plan. Career staff must arrange to receive training progress reports (i.e. transcripts) from participants inadequate time to process the subsequent tuition payment. Career planners must develop with participants who are not earning satisfactory progress in their coursework a service strategy to overcome the barriers impacting progress.
- WIOA ITA funding may be terminated if participants do not earn satisfactory progress for two (2) or more consecutive school terms (i.e., quarters, semesters, etc.).

USE OF TRAINING ACCOUNTS (NON- ITA'S):

Local areas may use a Training Account (TA) when a training provider is not on the Maryland Eligible Training Provider List (ETPL), but wishes to provide training to Workforce Innovation and Opportunity Act (WIOA) Title I participants enrolled in Prince George's County Local Workforce Development Board WIOA Title I Career Services provider programming. Pursuant to the Maryland Department of Labor, previously the Maryland Department of Labor, Licensing and Regulations, Policy Issuance 2017-09, "A Local Board may use a contract for services instead of an Individual Training Account (ITA) only when one or more of the following five exceptions apply and the Local Area has fulfilled the consumer choice requirements of 20 CFR 680.340, as described below

- When the services provided are on-the-job training, customized training, incumbent worker training, Or transitional jobs:
- When the Local Board documents a determination that an insufficient number of Eligible Training Providers (ETP) exists in the Local Area to accomplish the purpose of a system of ITAs.
- When the Local Board determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization to serve individuals with barriers to employment as defined by WIOA and Maryland
- When the Local Board determines that it would be most appropriate to contract with an institution of higher education 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 using this exception, the Local Board must document its determination in writing.
- When the Local Board is considering entering a Pay-for-Performance contract, and the Local Board ensures that the contract is consistent with 20 CFR 683.510

RESOURCES:

- TEGL 19-16
- TEGL 7-20
- WIOA Section 134 (c)(G) & WIOA Section 129 (c) (2) (D)
- Proposed 20 CFR 680.300, 680.320, 680.330 & Proposed 20 CFR 681.550
- Local Area Training Provider Exception Policy, 1.4000.100.005

REASON FOR POLICY:

This policy outlines Prince Georges County local directives for providing training services for WIOA eligible adults, dislocated workers, and youth participants.

EXCLUSIONS TO THE POLICY:

None

FORMS:

None

APPROVING SIGNATURES:



Charnetia Young (Aug 20, 2021 11:41 EDT)

Aug 20, 2021

Charnetia V. Young
Board Chair
Prince George's County Workforce Development Board

Date