

**Capital Region Workforce Partnership  
Workforce Development Board  
WIOA Service Policy #106**

**Access to Participant Training**

**References:** Workforce Innovation and Opportunity Act of 2014; Section 134(c)(3)(F) and (G)  
WIOA Final Rule, 20 CFR Parts 680.300 and 680.310

**Date:** December 1, 2016; Revisions effective September 23, 2021

**Purpose:**

The policy conveys the means by which training resources within the Capital Region are allocated and the manner in which customers can access such services.

**Background:**

The Capital Region Workforce Development Board makes training assistance available to customers through funding provided under the Workforce Innovation and Opportunity Act (WIOA). Under the WIOA, training assistance is primarily arranged through the issuance of an Individual Training Account (ITA). Other arrangements are also permissible and are discussed under the "Exceptions to ITA" portion of this policy.

Consumer choice is a component of the training process under WIOA. However, customers are expected to work closely with their case managers in planning their employment future through the use of ITA resources in an informed manner. This should include, but not be limited to: skill, interest and ability assessments, labor market conditions and trends, training provider performance, program cost and current and future earning potential.

**I. Eligibility for Training:**

Customers enrolled in a WIOA program may access training services if after interview and consultation with a case managers, and assessments as described in Section II., it has been determined that:

- A. They are unlikely to obtain or retain employment at self-sufficient wages through provision of career services alone,
- B. They are in need of training to obtain or retain employment leading to higher wages, and
- C. They have been determined to have the skills, qualifications and other supports in place to successfully participate in the desired program of training services.

**II. Assessment Factors:**

In order to accurately assess the customer's ability to be successful in the pursuit of training, the following list should be used by staff in their engagement with the customer during the development of their service plan:

- A. Customer's educational level;
- B. Previous skills training;
- C. Employment readiness level;
- D. Career goals;
- E. Customer's aptitude and interest for the selected training, and tolerance to environmental factors and/or working conditions associated with the training;
- F. Availability and length of training;

- G. Cost of training;
- H. Financial ability of customer to undertake and complete training along with any ancillary costs;
- I. Potential for a customer to obtain employment that advances their earning potential beyond wages reported at the time of enrollment and towards self-sufficient wages as may be defined by the Resource WIB;
- J. Physical assessment to determine any limitations that would preclude them from performing work for which participant is being trained;
- K. Criminal background check, if appropriate, to identify barrier crimes that would preclude participant from employment in identified occupation;
- L. Drug testing if required by the training provider or occupation as a condition of employment

Not all factors must be used in every case nor do all have to be completed by workforce center staff. Previously administered assessments **less than a year old** may be used.

### III. Coordination of Financial Aid:

Once determined eligible for training, case managers/Career Coaches should ensure that customers are aware of the additional resources that may be available for training assistance, such as:

- Pell Grants
- Veterans Education Benefits/Tuition Waivers
- Employer/Union Educational Assistance
- Senior Tuition Waiver
- TAA Training Assistance

Board funds are only to be used for training assistance when it has been determined that eligible customers:

- A. Are unable to obtain such other forms of assistance, or
- B. Require assistance in an amount beyond that which the other forms of assistance will cover.

*With respect to PELL, a customer may receive WIOA funding for training if a PELL application is in process and awaiting a decision. In such cases, the Board's contracted service provider must have arrangements in place with training providers to ensure that WIOA funds will be refunded once the PELL award is made.*

### IV. Other Considerations:

- A. Training may only be arranged for programs that are on the state Eligible Training Provider List (ETPL) at the time that training is arranged. (If a program is subsequently removed from the ETPL, the customer may continue until completion).
- B. Training programs on the ETPL that are physically located outside the Capital Region may be considered dependent on logistical considerations such as the participant's demonstrated ability to incur extraordinary costs, e.g., living expenses, commuting, childcare, housing. All approved training must be located within the contiguous United States, and if not in Virginia, providers must be listed on that state's eligible training provider list.
- C. In no case will WIOA funds be used to pay for any training courses that were started prior to the date of a duly-authorized and signed ITA. Staff should maintain documentation in case files showing the training program had an approved status on the date of enrollment. (In the event the program is subsequently removed from the ETPL).
- D. Only those costs directly related to and required for the approved training programs will be covered as follows:
  - 1. Tuition, enrollment fees, and other fees such as lab and testing required for coursework outlined in the required course of study;

2. Required textbooks as listed on course syllabi;
3. Required supplies and training materials as listed on course syllabi or supply lists; and required tools as listed on course tool lists.

Additional items may be considered on a case by case basis and must be pre-approved by the trainee's Career Coach and/or others assigned to approve ITA's and associated support services.

- E. Participants are required to make satisfactory progress in training to access continued support of the training costs supported by their scholarship. Satisfactory progress is defined as follows:
1. The participant's grade point average does not fall below 2.0 for more than one consecutive quarter or semester if applicable;
  2. The participant maintains a grade point average sufficient to graduate from, or receive certification in, their approved area of study if applicable; and
  3. The participant is completing sufficient credit hours or equivalent to finish their approved course of study within the time frame established under their approved training plan. In the case of self-paced or non-graded learning programs, satisfactory progress means participating in classes and passing certification examinations within the time frame established under their approved training plan.

Contact with the Case Manager/Career Coach and documentation of satisfactory progress in training must occur, at a minimum monthly and at the end of each training period during the lifetime of the training plan to ensure the individual is making satisfactory progress in training.

Generally grade/competency reports or other appropriate information will be submitted by the student. If the student does not submit the required documentation, within the time frame established by the employment counselor, the customer may be declined future ITA funds until the information is received.

- F. ITA Vouchers will be issued in increments appropriate to the training program (such as by quarters, semesters, 3 or 4 quarter school years, or other training program durations) or appropriate to individual training provider's usual billing cycles. Continued issuance is contingent on satisfactory progress in training as defined above, as well as the availability of funding. The contracted service provider must make these factors known on the ITA form that is signed by the customer and training provider.

The customer and the training provider will be notified in writing regarding the discontinuation of funds due to factors outlined in Sections E. and/or F. above.

- G. Modification to Service Plan:

An individual may only modify their service plan with prior approval from the WIB's contracted service provider or designated Resource Staff. In this case, justification which supports that further training is needed in order for this individual to obtain employment is required.

## **V. Training Investment Guidelines**

The Capital Region Workforce Development Board takes seriously its role to be sound stewards of public funds and as such, has identified a tiered set of targeted industries in which to invest its training resources. The use of targeted industries ensures that training funded by the Board will better prepare an individual for jobs that are prevalent in the local economy. As such, maximum training allowances are structured in a way that reserves the highest amounts for those programs that will yield the best return on investment to the Board and most benefit the customer in their employment success. Allowances apply to the individual for the life of their active enrollment. The amounts do not count against other services such as

work experience, supportive services or OJT wages. Under special circumstances and with proper justification, a request can be made to the Board Director for a customer to exceed the ITA funding limit.

<b>Category</b>	<b>Maximum Allowance</b>
<b>Tier I Targets:</b> Educational Services; Healthcare; Manufacturing; Professional, Scientific and Technical Services and Transportation and Warehousing (logistics)	<b>\$20,000</b>
<b>Tier II Targets:</b> Administrative and Support; Construction; Finance; Hospitality and Retail	<b>\$16,000</b>
Occupations for which the Virginia Employment Commission projects at least 1% annual growth; or those supported by a recent economic development announcement	<b>\$12,000</b>
Occupations supported by a written letter from an employer committing to hire	<b>\$10,000</b>

## **VI. EXCEPTIONS TO THE USE OF ITAS FOR THE FUNDING OF TRAINING**

- A. When the training services provided are for on-the-job training, incumbent worker training, **contract** or customized training.
- B. When the Workforce Board determines there is an insufficient number of training providers in the region to meet ITA objectives.
- C. When the Workforce Board determines there are training service programs of demonstrated effectiveness offered in the area by community-based organizations (CBO) or other private organizations to serve individuals with barriers to employment.
- D. When the Workforce Board determines that it would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations **AND** such contract does not limit customer choice **AND** the contract is based on pay-for-performance.

The Capital Region Workforce Development Board reserves the right to make exceptions to this policy, on a case by case basis, should individual circumstances warrant exception.