

BACKGROUND: Training services can be critical to the employment success of many program participants. WIOA removes the requirement to sequence services, meaning case managers may determine training is appropriate regardless of whether the individual has received basic or individualized career services first. Training services may be provided if, after interview, evaluation or assessment, the individual meets the required training eligibility criteria (listed below), which is documented on the IEP.

- The individual is 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 alone (those in the adult and dislocated worker programs who are already self-sufficient are not eligible for funding for training, unless they are unlikely to remain so without training.).
- Is 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, through career services alone.
- Has the skills and qualifications to successfully participate in the selected program of training.

Training services must be linked to in-demand employment opportunities in the local area or planning region or in a geographic area in which the adult or dislocated worker is willing to commute or relocate. The selection of training services should be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, informed by the performance of relevant training providers, and coordinated to the extent possible with other sources of assistance.

Training services include occupational skills training (youth program component) and occupational classroom (adult, dislocated worker program component). The training services are funded through Individual Training Accounts (ITAs) and an expected outcome for participants in training services is the attainment of a diploma, certificate and/or credential. Other types of services covered through the ITA process include: secondary school diplomas (*must be accompanied by on-the-job training or occupational skills training for adults and dislocated workers*), Adult Basic Education, Alternative Secondary School Offerings, and other allowable training.

WIOA emphasizes utilizing career pathways to educate and train the workforce. Following this principle, short term training programs will be explored with individuals as a first option, taking into account the self-sufficiency targeted wage and employment goals.

ALLOWABLE TRAINING:

APPROVED OCCUPATIONAL TRAINING LIST: Effective for new ITAs approved after December 1, 2019, Wisconomy's Long-Term Occupation Projections List for WDA 3 is utilized to provide individuals access to a wide breadth of training choices for local in-demand occupations. Occupations on this list are not automatically eligible for training funds but need to meet the following in order to be considered (see below for approval process):

- Show positive projected annual openings; and
- Have a reported median salary of \$24,960 minimum (or career ladder into an occupation that has a \$24,960 minimum starting salary). (Note: "Entry" and "Median" wages should be used to determine minimum starting and median salaries, respectively. Career paths and career ladders must be approved by the Wisconsin Technical College System (WTCS).)

For occupations that do not have sufficient data available on Wisconomy, career planners must utilize other credible resources (e.g., Bureau of Labor Statistics, CareerOneStop) to determine positive projected openings and/or median wages. For new occupations that do not yet appear on state or federal data resources, local job posting resources that show at least 20 current openings and median posted wages may be used. Career planners shall cite the information gathered and sources used in the participant's file.

ADDITIONAL CRITERIA: All programs need to meet the following criteria:

- Be occupational in nature or other allowable training;
 - Other Allowable Training: GED/HSED, remedial, adult literacy, and computer classes;

- Occupational: Occupational training covers programs which lead to a credential and fall along a WTCS-approved career path and include programs ranging from short term professional certificates up through Bachelor Degree programs;
- Be along the WTCS-approved career path for an occupation title on one of the lists, as long as:
 - The outcome leads to self-sufficiency for the individual or less if the individual requests it; and
 - There is a documented need for the training in order to become employable; and
 - Individual Employment Plans and ITA Career Goal must clearly list Occupational Goal and anticipated WTCS-approved career path pieces to be completed during current enrollment episode, as more than one training program will not be paid for during each program episode;
- Must lead to an industry-recognized credential (exceptions: training as a prelude to occupational training, or computer classes);
- The training provider and program must listed on the State Eligible Training Provider list;
- Training through professional organizations is allowable as long as above criteria is met;
- On-line programs, including those with providers who are located out-of-state, are allowable as long as above criteria is met;
- ITA's for completion of baccalaureate degrees will be considered. The participant must be able to prove junior status in their chosen field. ITA's for post-graduate degrees will not be considered;
- Failed classes will not be paid for again, unless there was a documented, involuntary reason for the first failure;
- Individuals who voluntarily drop out of training programs will have to reimburse the service provider for tangible costs and will not be eligible for future funding. Tangible costs may include equipment, tools, supplies, and fees; and
- Yearly Association or Union dues are not allowable expenses.

OTHER ALLOWABLE TRAINING: The Board also recognizes the value of training programs that may not meet the credential definition for performance purposes or directly lead to occupations with wages above the approved median wage but would enhance employability and the ability to be successful in advanced training programs. As a result, the Board agreed to continue funding the following training programs that do not meet the credential definition, but are critical to the success of most individuals entering or re-entering the workforce or considering changing jobs requiring different skill sets:

- GED/HSED: Per WIOA policy, GED/HSED is a recognized credential. However, Adult and Dislocated Worker participants can only access adult literacy services if they are provided concurrently or in combination with one of more of the following: occupational skills training, on-the-job training, incumbent worker training, or other training programs. Youth program participants do not need additional services. Remedial education classes necessary to upgrade skills for employment or to enter a degree program
- Computer classes that are a prelude to degree program courses in any industry sector
- Computer classes if necessary to obtain employment in any industry when the participant already has credentials and occupational skills
 - The dollar limit for any number of computer basic classes and related books and supplies is \$1,800. If the total of \$1,800 is not spent in one fiscal year, another ITA for the unspent balance may be approved for additional basic computer classes in the next fiscal year. The limit is \$1,800 over 2 fiscal years. No third year because this is intended to be short-term intensive basic training.
 - Software Expenses: Funding for software will only be allowed when all of the following conditions are met:
 - The course is an on-line course (meant to be taken on a home computer).
 - The course syllabus lists the software as required.
 - The participant does not already have the software on their home computer.
 - We do not pay for computers, internet connections or software for classes taken prior to the course offering.

FUNDING AMOUNTS AND LIMITS: The funding limits for Individual Training Accounts (ITA) will be:

- Other Allowable Training: \$1,800 per fiscal year (July 1 – June 30)
- Occupational Training: \$4,000 per fiscal year (July 1 – June 30)

Participants in occupational training, regardless of the length or type of program, can receive an ITA for a maximum of \$4,000 per fiscal year after student financial aid grants have been applied to the total cost of the

training. Because of the ability to enter the workforce sooner by utilizing career path programs, and because not all participants are able to complete programs in 2 years, the Board approved a lifetime limit of \$10,000 per participant for ITAs effective for all current and new participants beginning 1/1/09. Total amount per participant will be monitored by the service provider. Participants will be notified when they are nearing the limit and will be told upon future enrollment their limit status. ITA funds not utilized by a participant will be de-obligated at the time of the ITA end date. Funds will not be carried over to the following year but will go back to the general training fund for redistribution for other participants.

It is legislated that local areas must consider the availability of other sources of funds to pay for training costs such as scholarships, other programs and Federal Pell Grants. All participants interested in training programs will be required to explore other sources of funding and report on status of that potential funding. Those in occupational training must also apply for financial aid and to bring in proof of both application and award letter. With the ability to apply for financial aid beginning October 1 utilizing the previous year's tax information and with the school's "priority deadline" of April 1, all continuing students should be able to provide award letters when they are requesting funding. Unless there are unusual, documented reasons why the award letter is not received, the award letter should be submitted with the ITA. Those that do not have an award letter and do not have an unusual, documented reason, will not be reviewed as part of the continuing student process. Any grant or scholarship received by a trainee will be applied against the current semester's total training cost (ITA) and must be reported to the WIOA case manager. Once current semester bills are paid, award refunds that were mailed to students by the school can be cashed/used by the student for any purpose.

FULL-TIME STATUS: Full time training is defined as enrollment in an accredited educational program, approved by the WOW Workforce Development Board and must be at least 12 credit hours (6 credit hours during the summer). Under certain circumstances less than full-time training may be allowable on an individual basis and must be documented on the ITA before the ITA is approved. Such part-time training should be for a short period of time and be consistent with the participant's assessment and occupational objectives. Examples of the allowable part time training are:

- Inability to schedule training courses due to lack of availability.
- Only a few courses are needed to complete a degree.
- The need to work while participating in training activities.

If part-time training is approved as part of the ITA, part-time employment will be strongly encouraged.

PROGRAM ENROLLMENT: Individuals who have registered or enrolled in an academic or technical program prior to enrolling in the WIOA program will not be eligible for reimbursement of any previously incurred expenses. WIOA participants must be accepted into the training program, not just the school (example: formal application for admissions in accounting program). Sometimes training program admissions is restricted to certain months or days and any individual who misses the enrollment date deadline will not be accepted until the next open enrollment. ITA's will not be approved for participants who were not accepted into the program because they missed the deadline. The next opportunity for training program enrollment should be noted on the financial aid information form. For any payments of training costs after the next possible program enrollment date, a copy of the letter approving acceptance into the program must accompany the subsequent ITA or next semester charges.

VOLUNTARY DROP FROM SCHOOL: Individuals who voluntarily discontinue or fail to start an authorized training program will not be eligible for a subsequent training program paid for with ITA funds. Only the WDB Director can approve a subsequent training program based on rare and exceptional circumstances. The participant will reimburse the service provider for any tangible costs related to the training (example – uniforms or tools) if the training is not started or not completed. Reimbursement/return will take place within 90 days of notification of intent to discontinue/drop training. Should participants voluntarily drop or fail to start training, both the case manager and the training institution are to be notified immediately by the participant.

Policy Adopted:	10.00.2004
Policy Revised:	04.00.2007; 12.00.2008; 01.01.2009; 06.00.2009; 02.08.2013; 07.01.2016; 03.16.2017; 12.07.2017; 12.06.2018; 12.01.2019; 03.12.2020
References:	Workforce Innovation and Opportunity Act; DWD/DET, Workforce Innovation and Opportunity Act Program Guide; 2 CFR Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards