

Training Policy

(Revised effective for training terms beginning after September 15, 2016)

The Workforce Innovation and Opportunity Act (WIOA) details the delivery of basic career, individualized career, and training services provided by the one-stop delivery system. The policy in this document details Local Area policies relating to occupational skills training delivered through Individual Training Accounts (ITA's) at the training level. This policy applies to occupational skills training provided to adult, dislocated worker, and youth participants under WIOA.

Eligibility for Individual Training Accounts

The Workforce Innovation and Opportunity Act outlines the requirements for an individual to access training services. Those requirements include lack of success in finding self-sufficient employment through individualized career services; selecting training areas from a list of occupations directly linked to opportunities in Guilford County and periodically updated by the local Workforce Development Board (WDB); and requiring additional assistance beyond available grant resources to pay for training.

The Local Area has implemented additional requirements that participants must meet for issuance of an ITA to pay for direct training expenses:

- Select a training provider from the approved list found on the NCWorks Online website at www.ncworks.gov. Training providers are approved based on the WDB Eligible Training Provider List Policy. Only in-state programs are approved for training, with the exception that an out-of-state program can be approved if it is tied to a specific, documented job offer of employment in North Carolina.
- Complete an Individual Employment Plan in conjunction with a career developer.

- Complete a comprehensive assessment that documents the customer has met the required aptitudes, interests, and academic levels for at least one of the customer's stated occupational training interest areas.
- Complete a Career Exploration Workshop in either a group setting or oneon-one with a career developer that includes an analysis of suitability for the chosen occupation.
- Have a high school diploma or its equivalent as well as meet any
 additional academic requirements of the selected school or additional
 minimum academic skill levels established by the WDB. In some
 circumstances, it may be possible to request an exception to this policy,
 but such a waiver must be approved by the Local Area Operations Team.
- Have applied for federal financial aid (which includes Pell, FSEOG, Work-Study, etc.) and all other financial aid offered by the particular institution for any program for which such assistance is available. All students (new and returning) must document that their Pell application has been resolved¹ by showing either approval (with the amounts awarded) or denial of a grant award. An application alone will not be sufficient for documentation and sponsorship approval.
- Have completed, in conjunction with a case manager/career facilitator, a Financial Award Analysis Form consistent with DWS Policy Statement PS 08-2015 (7-13-15) to determine the total "cost of attendance", which should include direct training expense, supportive services costs, and other living expenses, such as room and board needed to effectively participate in training. The form must include an analysis of the grant funds awarded through the training institution's financial aid office, including Pell. WIOA funds may not be used to duplicate direct training expenses for which other financial grants have been specifically awarded by cost category, such as tuition, books, etc. However, if the financial aid grant award is non-specific as to cost categories, then WIOA funds may be used to bridge the gap between awarded financial aid and total cost of attendance.
- Must not be in federal loan default and, by definition, ineligible for federal educational grants. This policy applies only to students being sponsored through an Individual Training Account.
- Must make application to the selected school and provide proof of acceptance into the course of study (may be contingent upon payment) if he/she is a new student or proof of good standing at the school if a continuing student.

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¹ For programs that are eligible for Pell funding

- Must provide written direct training cost requirements associated with participation in the selected training, as <u>required</u> by the chosen school.
- Direct training expenses are defined as tuition, fees, books, supplies, uniforms, tools, and other items <u>required</u> for the course of study.
- Payments will be made only to eligible training providers and not directly to customers.

Requirements for Continuing Sponsorship

- Students must maintain a cumulative GPA of 2.25 or better. If a student drops below that level for any school term he or she will be warned and allowed one additional term to bring that level up to the standard to avoid termination of sponsorship.
- Students must submit previous term transcripts, confirmation of current Pell Grant status, and specific required training costs by established deadlines for each term.
- A student must remain on target to complete training within the timeframes indicated below. Prior to each school term, completed vs. required semester hours are compared. Sponsorship may be terminated if the student reaches a point at which he or she is mathematically incapable of graduating within the allotted timeframes.

Payment Limitations for Individual Training Accounts

- The payment policies and total amounts per ITA will be limited according to the following parameters. Payment limitations are based on the length of training, with the twelve month limitations starting at the start of training.
- Students may only be sponsored for training programs designed to be completed in 24 months or less or, in the case of existing students, when 24 months or less remain to complete the program. This would include the final two years of a four-year program. The maximum allowable time in which to complete any course of study is 36 months.
- Total payments for the first twelve months of a program may not exceed \$2,000 for all new training requests for school terms beginning after September 15, 2016. WIOA funds may be used for any direct training cost including tuition, school fees, books, outside examination fees, tools and uniforms. Total payments for the second twelve months of a program (if the program lasts longer than one year) may not exceed \$2,500.

- Total lifetime payments may not exceed \$4,500 and must be spent within twelve (12) months of the original planned ending date of the course of study. For students who are currently in school and have completed a financial aid analysis under the former \$8,000 limit, but remain actively enrolled in WIOA and have not exceeded the overall 36 month limitation to complete training by September 15, 2016, additional funding may be made available beyond the \$2,000/year, \$4,500 lifetime only for the Spring 2017 semester up to the previous payment caps. Following the Spring 2017 semester, all new and returning students are subject to the new payment caps.
- Based on labor market information, the WDB may allow pilot programs in limited occupational clusters that exceed the 2 year/\$4,500 cap. If approved, these programs will have a limited number of slots, and will be specifically identified by the WDB.
- ITA payments are only made to training providers on the State and WDB approved list. Additional payments for <u>required</u> tools, uniforms and other materials not available through the training provider may be made directly to other vendors.
- ITA payments to the provider are to be split based on their training calendar (semester, quarter, etc.) For trainings with multiple semesters, payments will not be made in full at the start, but shall be made for each semester.
- Vouchers will be issued to training providers at appropriate points within the training such as semesters and quarters. If training is provided in a single session, appropriate return of funds for uncompleted training will be negotiated with training providers in conjunction with their existing policies.
- Exceptions to time limits and dollar caps may be made on a case-by-case basis due to extenuating circumstances such as long-term illness or disability and subject to approval by the Local Area Operations Team.
- The WDB will review the limitations contained in this policy on an annual basis.

Skills Upgrade Training Parameters

Individuals who have entered the training services level and are enrolled under WIOA will be allowed to take fully or partially subsidized skills upgrading courses that will enhance their ability to find employment in their targeted field and/or to increase computer literacy in general. Such courses will not fall under the Individual Training Account Policy. The following parameters will apply:

- The participant must be a high school graduate; exceptions must be approved by the Local Area Operations Team based on individual circumstances.
- The maximum allowance per course will be \$500 for tuition, fees, uniforms, tools, certifications, licenses, equipment and books. The Local Area will not partially sponsor skills upgrade classes. If a customer wishes to take classes costing in excess of \$500, he/she will need to fund those classes on their own.
- Local areas will sponsor up to \$1000 per year in skills upgrade classes.
 The can be split among multiple classes that cost less than \$500, as long
 as the total does not exceed \$1000. Total lifetime payments for skills
 upgrade classes may not exceed \$2000.

Curriculum Change and Return to Training

Students may change specific curriculums within an occupational area upon approval by the program unit manager when deemed appropriate. A change of curriculum due to obtaining additional credentials within the same career pathway would be considered as falling within the same occupational area.

Curriculum changes outside of the occupational area or permission to receive additional training at a later date will also be upon the approval of the program unit manager but should be due to one of the following circumstances:

- The training or curriculum they are pursuing or have completed was originally in an area approved by the WDB but economic or other conditions beyond the individual's control have now made that occupational area no longer viable in the current local job market.
- Extenuating circumstances beyond the individual's control have made it
 impossible or impractical for them to work in the particular occupation in
 which they have trained or are training. The most common example of
 this would be an acquired disability. In such cases, it would also be the
 practice of the Local Area to utilize other training resources where
 appropriate, such as Vocational Rehabilitation.
- If a customer is approved for a change or retraining under the guidelines above, they will re-enter the system as a "new customer" with a new set of dollar and time limitations.