



TRAINING AND SUPPORT SERVICE PAYMENT POLICY

E-420

Purpose.

The Workforce Innovation and Opportunity Act (WIOA) and cognizant regulations require Workforce Development Boards (WDBs) to develop policies for the payment of training and support services applicable to the local area. WDB's may also establish limits on the provision of training and supportive services, including a maximum amount of funding and maximum length of time supportive services are available to participants. This document establishes the training and support service policy for the Southwest Wisconsin Workforce Development Board (SWWDB).

Policy.

The SWWDB shall allocate WIOA and other program funds to pay training and support service costs for eligible participants who are involved in Title I career services and/or training activities and who are unable to obtain such payments through other programs. All training and support service payments must be documented and vouchered through the SWWDB Payment Authorization System (PAS) or as described in the WIOA and other Service Provider contract(s).

Participant need for training and/or supportive services must be established and documented through the assessment process and indicated on the participant's Individual Employability Plan (IEP) or Individual Service Strategy (ISS). The guidelines and limits listed in this policy apply to WIOA Title I Adult, Dislocated Worker (including Special Response and National Emergency Grant), and Youth participants. Individuals participating in other employment and training programs (i.e. the FoodShare Employment and Training Program) are subject to the limits provided in this policy unless such limits conflict with regulatory guidance. Regulatory guidance will take precedence in the event of a policy/practice conflict.

Training Services

A program of training services is one or more courses or classes, or a structured regimen, that upon successful completion, leads to (1) a certificate, associate degree, or baccalaureate degree; or (2) the skills or competencies needed for a specific job or jobs, an occupation, occupational group, or generally, for many types of jobs or occupations, as recognized by employers and determined prior to training.

For this expenditure requirement, training services may include:

- Occupational skills training, including training for non-traditional employment;
- On-the-job 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;



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- Job readiness training: Job readiness training includes services that teach skills needed to be successful in the workplace rather than skills needed to get into the workplace. For example, job readiness training teaches skills such as office communication, punctuality, and how to conduct oneself with supervisors and co-workers; however, it does not teach skills such as job searching, interviewing, or resume writing;
- Adult education and literacy activities provided in conjunction with one or more of the other training services listed above;
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training;
- Services that meet the requirements specified in Title 20 CFR Section 663.300; and/or
- Other services that would be defined as a training expense, but will be identified as "Support of Training" include those that:
 - Are specific to the training the participant is receiving;
 - Are necessary in order to participate in and graduate from the training;
 - Are required for every student in the training;
 - Are benefit to the individual only if they are in the approved training;
 - Are documented in writing by the training provider as required. (Acceptable documentation includes a supply list for the course, an email from the training provider, or any other documentation that verifies the items are required for the course.)
 - Examples include: books, licenses, tools, equipment, safety gear, drug testing, testing fees, certification fees, student association fees, background checks, and uniforms.
- Services that do not meet this criteria include, but are not limited to, groceries, child care, dependent care, transportation, parking, housing, clothing, health care, financial counseling, and needs-related payments.

With the exception of certain types of customized and On-the-Job training, and the alternatives to traditional ITA training programs described in the Alternative Training Programs Policy, only training providers through their training programs listed on the ETP are eligible to receive WIOA funds.

Training Payment Guidelines

- The participant possesses the basic skills needed to complete the selected program or is receiving basic/remedial instruction prior or concurrent to occupational skills training.
- The participant has completed a SWWDB-approved career interest assessment and the identified training program aligns with the assessment results.



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- Work-based training amounts, including but not limited to, On-the-Job training, customized training, and youth work experience, will be negotiated written agreements based on the type of job and the starting wages paid to the worker and are subject to the lifetime limit.
- Eligible training shall comply with the Wisconsin Department of Workforce Development (DWD) Approved Training Program guidelines and Eligible Training Provider (ETP) list.
- Eligible training shall also meet DWD and SWWDB guidelines for high-wage/high-growth jobs.
- Follow-up Services: Individuals engaged in follow-up services can receive training services if appropriate to the IEP or ISS and if need is established. Payment for post-exit training services during follow-up are rare occurrences and require authorization from the SWWDB Workforce Operations Manager.
- Short-term training which is 18-weeks or less will be capped at \$5,000 per participant.
- Long-term training, which is defined longer than 18-weeks and up to 2-years in duration, shall be eligible for the full \$10,000 payment.
- Training assistance is to be coordinated with other funding sources.
- Training vouchers can only be submitted for payment of "Tuition Only." Examples of the different names used from one training institution to another include but not limited to tuition, seminar, course, class, session, boot camp, etc.

Supportive Services

Supportive services are participant services that are necessary to enable WIOA-eligible individuals, who cannot afford to pay for such services, to participate in authorized WIOA activities. For Youth participants, such activities must correspond to the Fourteen WIOA Elements for Youth Programs. SWWDB limits supportive service payments as follows:

- Supportive services are only to be provided to clients who:
 - are participating in WIOA individualized career or training services or who are participating in the youth program;
 - unable to obtain the supportive service through themselves, a personal support network or through other programs including community agencies; and
 - demonstrate a need for assistance to enable participation in designated WIOA Title 1 activities as established through assessment.
- The cost of supportive services must demonstrate a direct connection to participation in employment and/or training activities which will build skills needed to succeed and advance in the workplace and will result in employment leading to self-sufficiency.
- Approval of supportive services shall be made on a case-by-case basis only when it is determined that the assistance is necessary and reasonable, and:



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- when need is established and alternate assistance is not available or insufficient;
- when need and lack of alternative resources have been documented, and;
- services are necessary for the customer to achieve the goals outlined in the IEP or ISS.
- Case managers shall ensure that determination of need is fair, consistent, and equitable, and that similarly situated participants have access to similar supportive services.
- Case managers shall ensure that support services costs are reasonable and necessary. A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs.
- Funds designated for supportive services will be reserved at the beginning of the program year. If funds become depleted during the year, SWWDB administration will consider options for making additional supportive service funds available.
- Support service costs shall be limited to a lifetime maximum of \$5,000 per participant, and are eligible in the following categories:
 - Support of Training: Any cost associated with and is required by the training institution for a customer to participate in an approved training program. Examples include, but are not limited to fees, books, tools, clothing, equipment, etc...
 - Childcare: Childcare costs are defined as payments made to certified or licensed providers for child care provided to a dependent child or children in the legal custody of the participant. Childcare shall only be paid for the time the client is involved in training or other approved program activities.
 - Transportation: Transportation costs include gasoline, bus passes, and/or vehicle repairs that enable an individual to travel to and from approved program activities. SWWDB further requires that:
 - Payment for gasoline will be limited to \$0.30 per mile using the most direct route from the participant's home to the place of approved program activities.
 - Payment for vehicle repairs must be limited to essential repairs that result in a safe mode of transportation, that are performed by a certified repair dealer who possesses a Federal Employer Identification Number (FEIN) and based on two (2) written estimates:
 - **Approval for vehicle repairs must be obtained prior to the repairs being made.**
 - Payment of legal fees, fines, and other costs associated with revocation or suspension of a participant's driver's license is not permitted.
 - SWWDB reserves the right to direct the type of transportation that shall be used when more than one method of transportation is available.



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- Job Related: Job related costs are defined as occupation-specific tools, uniforms, or protective clothing, occupational testing for certification purposes, and commercial driver's license (CDL) related fees required as a condition of employment.
- Education Related: Application fees paid to determine a participant's eligibility and acceptance at an educational institution and which will allow the clients to obtain information on financial aid awards.
- Medical Exams/Glasses: Medical exams needed for training or employment; drug testing; fingerprinting; vision exam; eye glasses or protective eyewear.
- Wrap-Around Services for WIOA Co-Enrolled TAA Participants: TAA participants shown to have no source of needed supportive services can request assistance through the WIOA Dislocated Worker program.
- Follow-up Services: individuals engaged in follow-up services can receive supportive services if appropriate to the Individual Employment Plan or Service Strategy and if need is established. Payment for post-exit supportive services during follow-up are rare occurrences and require authorization from the SWWDB Workforce Operations Manager.
- Other supportive services include, but are not limited to: testing/certification fees; supplies to complete a program activity; clothing for a job interview, if needed; standard driver's license and vehicle registration fees if needed for program participation or employment; Birth Certificate fee when needed for employment or program participation, and; basic hygiene products to ensure successful participation in a designated program activity.
- Payment for any of the following is prohibited and WIOA funds cannot be used for these costs:
 - Payment of legal fees, fines, and other costs associated with revocation or suspension of a participant's driver's license.
 - Business Capitalization: WIOA funds cannot be used to capitalize a business. For example, the purchasing of tools as a post-employment follow-up service for a participant who is or will become self-employed.
 - Medical services and procedures, including transportation to medical appointments.
 - Deposits: WIOA funds cannot be used to pay or reimburse for any type of deposits, e.g. rental, lease, etc.
 - Costs for services, events or other expenses that were incurred before participant's WIOA enrollment or without case manager consent.

Authorization Limits



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- SWWDB reserves the right to establish a lifetime maximum authorization limit that will effectively cap the total amount of SWWDB funding a participant can receive and to change this limit at any time without prior notice to program operators and/or clients.
- The maximum authorization limits shall apply to all WIOA programs operated by SWWDB and all funds issued to or on behalf of the client.
- The lifetime maximum authorization amount, for all types of training and support services, is \$12,500 per individual.
- The lifetime maximum authorized training limit is \$10,000.
- The lifetime maximum authorized support service limit is \$5,000.
- Sublimit: Short-term training, which is 18-weeks or less, is capped at \$5,000 per participant.
- For WIOA, payment for remedial and basic skills education including GED/HSED coursework and testing is allowable as a training expense if it is completed in conjunction with an eligible training program.
- Long-term training, which is defined longer than 18-weeks and up to two (2) years in duration, can be eligible for the full \$10,000 payment.

Training and Support Service Guidelines:

- The full scope of training and support assistance must be clearly defined in the IEP or ISS and authorized by establishing an Individual Training Account (ITA).
- Payments of training and support services will normally be made directly to the vendor providing the service(s). Direct reimbursement to individuals, to compensate the individual for expenses already incurred and/or paid, will not be approved without the written pre-authorization of the Workforce Operations Manager.
- Payment of training and support services will be coordinated with all other available resources and services within the local area. Clients will be referred to other agencies for services as a first priority and prior to using WIOA funds.
- Program operators who encounter a client with a unique or extenuating circumstance related to this policy may apply for a waiver of the authorization limit(s) by presenting written documentation through the PAS system to the Workforce Operations Manager citing the facts of the situation and why the waiver is necessary. SWWDB has sole authority on whether to grant a waiver.
- Obligation of funds for training and supportive services is limited to available funding.
- SWWDB strictly prohibits the reimbursement or payment of any training and/or support expenses that were incurred prior to the customer's enrollment into the WIOA Adult, Dislocated Worker, Youth programs or other program operated/administered by SWWDB.



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The Board directs the Chief Executive Officer to implement this policy, and to develop and maintain procedures that will guide the expenditure of training and support service payments in a manner that is practical, uniform, and complies with applicable federal and state laws and regulations. The Workforce Operations Manager is operationally responsible for management of training and support service payments in coordination with SWWDB's Finance Department.

Program operators are expected to adhere to the maximum authorization limits set forth in this policy and have a responsibility to explain training and support service payment limitations to clients. Program operators shall be required to obtain and place in the participant's file documentation verifying that the person was unable to obtain services through other programs and that the payment of training and support service costs was necessary to enable an individual to participate in program activities. Program operator compliance with this policy will be reviewed during the annual SWWDB monitoring and will be a factor in SWWDB's evaluation of program operator performance. Any disallowed costs associated with failure of the program operator or its staff to comply with this policy will be the responsibility of the program operator.

References: Workforce Innovation and Opportunity Act, Sections 3(59), 134(c)(2)(A)(ix)(I), and 134(d)(2) and (3)
 20 CFR WIOA Regulations, Parts 663.800, 663.805 and 663.810
 DWD/DET, Workforce Innovation and Opportunity Act Program Guide, Section III and VI

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