

Mountain Area Workforce Development Consortium Individual Training Accounts

Individual Training Accounts (ITAs) are authorized under the Workforce Innovation and Opportunity Act and will be issued by the WIOA service provider located in the integrated One-Stop Career Center's delivery system to eligible individuals. The ITA is an account established on behalf of an eligible individual and will be funded with Adult and Dislocated Worker funds authorized under Title I of the WIOA. ITAs will be issued to eligible individuals who may select a program of training services that are directly linked to employment opportunities either in the Mountain Area Region or in another area to which the individual is willing to relocate.

The Individual Training Accounts place training choices in the hands of the customer. Customers will be able to select high quality training on their own. The list of eligible training providers may be found on the Internet at www.ncworks.gov. The WDB will certify vendors of high quality relevant to the labor market demands. Customer information about eligible training providers will be made available to all training seekers through the NCWorks Career Center system and service providers.

In order for an individual to be eligible to receive the ITA, the following process will be followed for all WIOA long-term training participants:

- ▶ The individual must first seek employment through the Core services, and, if necessary, through Intensive services.
- ▶ If these services have not resulted in employment, a discussion will occur regarding training strategy with the case manager or employment counselor.
- ▶ The discussion will include a review of employment and training interests and the results of any recent assessments or test scores obtained as part of the intensive services received by the individual.
- ▶ The individual will be enrolled in the Career Ready 101 Tutorial program online and will be required to complete the WorkKeys assessments for the NC Career Readiness Certificate by the end of the training period.
- ▶ The case manager and client will develop an Individual Employment Plan (IEP) including goals and objectives.
- ▶ The case manager will provide information regarding the Individual Training Accounts and discuss with the individual his/her responsibility regarding the ITAs.

- A review of the labor market information will be conducted, either by the individual, the case manager, or both, to determine that the occupation selected is in demand and that employment opportunities exist in the area.
- A review of the statewide list of eligible training providers registered in NCWorks will be conducted to determine the provider's requirement for enrollment, performance outcomes, and cost for the training course selected.
- A financial award analysis form will be completed by the case manager to determine the financial needs of the applicant and to determine if the applicant has previously applied for or is currently eligible or receiving financial aid. The case manager will then develop a cost estimate for the student to attend college in the selected curriculum to be assured that an over award of funds has not been made to support the student. Coordination of WIOA and Pell Grants is required and if an over award is identified the Pell Grant will be applied first to the cost of the training.
- A visit to the training provider's campus or training location to apply for enrollment into the selected curriculum, apply for the Pell Grant and other sources of funding, if available, will occur before the ITA is issued.
- An ITA application will be completed to include a demonstrated commitment to complete the training, knowledge of job requirements, knowledge of training course(s), and availability of jobs in the area. The application will include a list of costs for tuition, required books, and the cost of WIOA approved fees. Required Occupational Supplies (uniforms, shoes, tools, etc.) may be supported with up to \$500 in funding from the ITA after the WIOA participant engaged in the long-term curriculum training has completed at least on semester of training successfully and with a grade level sufficient to assure the continued participation in the training program.
- The individual must agree to make reimbursement to WIOA for applicable costs covered by other grant assistance should an over award of resources be identified after the application process.
- After the ITA is approved the individual must contact the case manager on a regular basis to advise of progress. Also, they must sign an agreement to provide attendance information, grades and/or progress reports while enrolled in WIOA approved training activities.
- After completion of the training the individual must provide documentation of completion to the integrated NCWorks Career Center WIOA case management staff and utilize the resources available through the center for job placement services if needed.

- After employment is obtained, the individual must contact the NCWorks center which provided case management during the duration of WIOA supported training and provide the case manager with the name the employer, wages/salary, and benefits information.
- Agree to participate in follow-up activities to determine employment retention and wages nine months to one year after employment and at other designated intervals after employment.

The approved and designated WIOA service provider will be responsible for managing the Individual Training Account voucher system in the integrated NCWorks Career Center. The WIOA service provider will assist eligible individuals with the purchase of a training program that meets the individual's training needs as evidenced by supporting documentation in the participant's permanent file.

Payment for training costs will be coordinated with any payment of training cost by other grant assistance. The WIOA service provider will be required to abide by contractual requirements, as well as Federal, State, and local policies and procedures. The WIOA service provider will be required to track expenditures of resources by individuals to ensure that individual accounts are not over awarded through WIOA Title I funds for the ITA. Only training providers that are on the NCWorks list of eligible providers will be reimbursed under the ITA training vouchers.

Individual Training Accounts will not be used to provide training under three conditions as follows:

- When the services provided are on-the-job training or customized training;
- When the local workforce development board determines that there is an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs, and
- When the local workforce development board determines that there is a training service program of demonstrated effectiveness offered in the area by a community-based organization (CBO), or another private organization, to serve special participant populations that face multiple barriers to employment.

a) Dollar Limits

In order to provide opportunities for as many adults and dislocated workers as possible, the Mountain Area Workforce Development Board will issue Individual Training Accounts in the amount not to exceed \$1,750 per semester and up to \$3,500.00 per year for a one year diploma/certificate program to include the fall, spring and summer semesters. For a two-year curriculum program the amount will not exceed \$7,000.00 for the two-year period. If needed an extra \$1,000 will be provided under the ITA if an extra semester is required to successfully complete the training program for an Associate's or Bachelor's Degree. The training funds will support the cost of tuition and the following

fees: Student Activity Fee, Technology Fees, Student Accident Insurance and other fees as required by the college and required books for the approved course of training. ITA funds may also be used to support the cost of fees for certification exams upon completion of training or in order to continue training. The case manager and the training institute will maintain appropriate records to ensure that the trainee does not receive an over-award of funding. The case manager will also monitor the progress of the trainee to insure a 2.0 grade point average is maintained before funding is continued each semester.

Those WIOA participants served by integrated NCWorks affiliate sites that are in need of long-term training will be referred to the nearest comprehensive workforce office in the Mountain Area's four-county region. For Madison County, participants will be referred to the Buncombe County comprehensive one-stop site (NCWorks Career Center Asheville) and for Transylvania County; referrals will be made to the comprehensive one-stop located in Henderson County (NCWorks Career Center in Flat Rock).

(b) Time Limits

The ITA will be issued on a semester basis, with training to be completed within a 2.5 year period for curriculum programs. The individual must meet the attendance and academic requirements on a semester basis in order to be certified for continued funding under the ITA policy. The case manager will review the trainee's progress and encourage completion of the training within the required time limit.

(c) Degrees or Certificates Allowed

The Mountain Area Workforce Development Board has approved the one-year certificate and diploma programs and two-year occupational courses of study leading to an Associate degree offered through the community college system and other training institutes that offer occupational skill training. The occupations approved for training must be in demand in the local labor market with self-sufficiency entry-level wages and potential for increased earnings.

On a case-by-case basis, the WIOA training counselor may request the sponsorship of eligible WIOA training participants that have demonstrated a strong ability to complete a Bachelor's Degree within the 2.5-year time limit.

The request for sponsorship with WIOA funds shall be made to the Workforce Development Director and will include evidence of the potential long-term training participant's completion of curriculum courses as required for the attainment of a Bachelor's Degree, the courses remaining to complete the degree program, the selected training provider (must be listed on the eligible providers list in NCWorks), the accreditation standards of the proposed training provider and any other information requested in order for the Director to make an informed decision regarding the individuals' ability to complete the training successfully within the 2.5-year time period. Upon approval, the WIOA training participant will comply with all directives to maintain contact with the WIOA training counselor in

order for WIOA support to continue for the duration of the training period. All other provisions of this policy apply as well.

(d) Procedures for Determining Case-By-Case Exceptions for Training that May be Allowed.

The Workforce Development Board provides flexibility so that the case manager may request exceptions to the cost and time limit for training. The request will be made on a case-by- case basis by the case manager and must be based on the individual's needs and circumstances. The request for an exception may include but is not limited to the following issues: the individual must work to support family; limited UI benefits available to the individual; the individual is not eligible for the Pell Grant or other grants or scholarships; family obligations; illness, circumstances beyond the control of the trainee; limited funding available to the Consortium and other exceptions as identified by the case manager. The case manager must present documentation that warrants the request for the exception. The request for the exception will be discussed with the NCWorks office training coordinator and approved by the Workforce Development Director.

(e) Period of Time that ITAs will be Issued

ITAs will be issued on a semester basis at a level not to exceed \$1,750 and the ITA will not exceed the allowed amount of \$3,500.00 per year or \$7,000.00 for the two-year period. The case manager will review the ITA at the completion of each semester and issue an ITA for the cost of the upcoming semester, as the need is determined and upon determination that the grade standard is sufficient to continue training supported with WIOA funds. If necessary, an additional \$1,000 will be allowed for the ITA if an extra semester of training is needed for the WIOA participant to complete the training program successfully bringing the total approved amount of the ITA up to the maximum amount of \$8,000.



MOUNTAIN AREA WORKFORCE DEVELOPMENT BOARD POLICY ISSUANCE: JULY 25, 2013

POLICY FOR PAYMENT AND TRACKING OF ADULT AND DISLOCATED WORKER TRAINING SERVICES CLASSIFIED AS WORKFORCE CONTINUING EDUCATION, REMEDIAL AND/OR PREREQUISITE CLASSES

The Mountain Area Workforce Development Board adopts this policy for the purpose of processing payment for tuition, required books and required fees associated with eligible Workforce Innovation and Opportunity Act (WIOA) clients participating in workforce continuing education, remedial and prerequisite courses.

Remedial and Prerequisite Classes

The term “prerequisite courses” in the context of this policy only refers to classes required by the education institution for full admission into a course of study. The term “prerequisite courses” does not apply to classes within a course of study that are required to be taken in sequence.

WIOA funds can only be used to pay for tuition, required books and required fees related to prerequisite classes and remedial math and reading classes at the highest level required by the educational institution for full admission into the approved course of study. Students participating in lower levels of remedial instruction must successfully complete those levels before being enrolled in an approved WIOA education/training course of study.

By State policy (Local Area Issuance No. 2000-03) WIOA payment for tuition, required books and required fees related to participation in prerequisite and remedial courses must be made by means other than Individual Training Account vouchers. The Mountain Area Workforce Board will issue Cost Authorization Forms to educational institutions assuring payment of these costs for individual clients that are properly enrolled in local WIOA programs. Funds provided for payment of tuition, required books and required fees related to participation in remedial education courses will be limited to \$500 or less. Payments for pre-requisite and remedial education classes will not be considered to be a part of a WIOA client’s Individual Training Account limit.

Workforce Continuing Education Courses

WIOA eligible clients may receive WIOA financial support for participation in Workforce Continuing Education classes that provide a credential that is recognized by local employers, or that is established as a nationally recognized credential. Payment for tuition, required books and, required fees (including testing costs) related to credentialed Workforce Continuing Education classes will be limited to \$1,000 or less for an individual client. The Mountain Area Workforce Board will issue Cost Authorization Forms to educational institutions assuring payment for tuition, required books, and required fees (including testing costs) for individual clients who are participating in approved credentialed Workforce Continuing Education programs.

If clear, written justification can be established that completion of non-credentialed Workforce Continuing Education classes substantially enhances a client’s employment prospects, WIOA support



can be provided to assist with the cost of participation. Payment for tuition, required books and required fees for an enrolled WIOA client's participation in non-credentialed Workforce Continuing Education classes is limited to \$500. The Mountain Area Workforce Board will issue Cost Authorization Forms to educational institutions assuring payment of tuition, required books, and required fees for individual clients who are participating in approved non-credentialed workforce continuing education programs.

Payments for pre-requisite, remedial education, credentialed and non-credentialed workforce continuing education classes will not be considered to be part of a WIOA long term training client's Individual Training Account limit.

Updated July 2015

Mountain Area Workforce Development Board

Policy Statement: 2014 Number 1

February 25, 2014

Funds Available for Workforce Investment Act Adult Core and Intensive Services are Sufficient to Serve all Persons Requesting those Services

The Mountain Area Workforce Development Board adopts the policy that the funds and resources available are sufficient to provide all customers the allowable Workforce Investment Act Core and Intensive Services that they request. Therefore, priority of services regulations stated in 20 CFR 663 Subpart F – Priority and Special Populations related to the limited provision of WIA Intensive services do not apply.

Resources for WIA Training Services are limited and the priority of services provisions of 20 CFR 663 Subpart F – Priority and Special Populations do apply to the provision of WIA supported training programs in the Mountain Local Area. This policy remains in effect until the levels of funding and resources require reconsideration of this policy. Veterans are always accorded priority of service.

Explanation:

WIA Core services include the services associated with helping someone with their job search and finding support for their basic needs. Specifically these services include: determination of eligibility for WIA services; registration for WIA services; orientation to WIA services available; initial skill level assessments; information on job vacancies and the skills required to be hired for those jobs; information on appropriate service providers for support services, training programs, and special needs assistance; labor market information; and several other general points of discussion that routinely occur between a job seeker and counselor.

WIA Intensive services are provided after at least one core service has been provided. Intensive services may include: comprehensive or specialized assessments of skill levels and service needs; in-depth interviewing to determine barriers to employment and appropriate employment goals; group and/or individual counseling for career planning; development of an individualized employment plan; short-term prevocational services; the development of communication skills, interviewing skills, effective work habits and behaviors; etc.

Core and intensive services are principally staff based functions and involve considerable use of online information services, tutorials and virtual services. In the integrated services model funding and resources are sufficient to provide these services to all clients seeking these services. ~~Therefore, WIA documentation rules that require staff, copy and retain verification of a client's membership in a~~

~~“priority of service” population (veterans, public assistance recipients and low income adults), do not apply. This significantly reduces the trouble that we put clients through in order to serve them. Clients don’t have to collect the required documentation and return at another time to receive core and intensive services. This also saves a great deal of staff time and allows us to better serve the customers we are working with. Of course, we are still providing services to the “priority of service” populations; we are simply not requiring them to submit documentation that they are members of those populations.~~

When a person is enrolled in a training service then we must follow all documentation of eligibility standards for WIA eligibility and for membership in a “priority of service” population, because our services to the client are much more extensive and funds are spent directly on their training for career development. We have been advised by the State DWS to implement this policy at the local level.

Mountain Area Workforce Development Board

Policy Statement: 2014 Number 2

February 25, 2014

Policy Statement Regarding the Implementation of Incumbent Workforce On-the-Job Training for Workforce Investment Act Eligible Adults

Incumbent Workforce On-the-Job Training (OJT) is designed to help a working, but “under-employed”, WIA eligible adult reach a “self-sufficient” wage as defined by the Local Workforce Development Board. Below you will find the most up-to-date chart that sets the “Self Sufficient” wage rate for the Mountain Local Area. Under this policy to be eligible to participate in the Adult Incumbent Worker OJT the WIA eligible client’s family income would have to be below the amount shown in the “Adult Self Sufficiency Earnings Level (Six Month Earnings)” column.

The “self-sufficiency” definition adopted by the Mountain Area WDB applies to the provision of intensive services for employed adults and dislocated workers. The self sufficiency chart below is based on the Lower Living Standard Income Level and varies according to the client’s family size. Employed One-Stop Career Center clients with earned income that fails to meet the self sufficiency standards established by the WDB are eligible to receive intensive services if their participation in core services fails to lead to a better paying employment situation. While employed adults are eligible for participation, if training opportunities or funds are insufficient they must be considered after persons in established priority groups are served.

Employed dislocated workers who have taken on jobs paying 80% or less of their former earnings are considered eligible for WIA Intensive services

The Mountain Area Workforce Development Board has established the definition of self-sufficient for determining whether an employed individual is receiving a wage that leads to self-sufficiency as follows:

1. to utilize the LLSIL guidelines with an upward adjustment for the family of one and two to 150% of the LLSIL; and
2. to utilize the LLSIL with an upward adjustment for a family of two to 150% of the LLSIL; and
3. to utilize the LLSIL at 125% of the published rate for families of three or four; and
4. to utilize the LLSIL at 110% of the published rate for families of five or six.

With the adjusted percentages, the guidelines for an annual and a six-month period are as follows:

Mountain Area Workforce Development Board: Adult Self Sufficiency Wage: 2013-14

Family Size	70% LLSIL (Six Month Earnings) (Youth Eligibility)	100% LLSIL by Family Size (Six Months Earnings)	Adult Self Sufficiency Earnings Level Percent of LLSIL	Adult Self Sufficiency Earnings Level (Six Months Earnings)	Full-Time (40 Hours, Wage/1 Earner)	Full-Time (40 Hours, Average Wage/2 Earners)
1	\$5,835	\$8,335.71	150%	\$12,503.57	\$12.02	NA
2	\$7,909	\$11,298.57	150%	\$16,947.86	\$16.30	\$8.15
3	\$10,856	\$15,508.57	125%	\$19,685.71	\$18.93	\$9.46
4	\$13,402	\$19,145.71	125%	\$23,932.14	\$23.01	\$11.51
5	\$15,818	\$22,597.14	110%	\$24,856.85	\$23.90	\$11.95
6	\$18,500	\$26,428.14	110%	\$29,070.95	\$27.95	\$13.98
Each Additional Family Member Add	\$2,682	\$3,831.43	110%	\$4,225.57	\$4.06	\$2.03

Source: DWS Policy Statement: #PS 04-2014 – Effective March 27, 2014

The wages for an adult must be at the adjusted LLSIL level listed above or more to be defined as earning a self-sufficient wage. The wages for the dislocated worker are defined as at least 80% of the wages the individual was earning when the dislocation occurred.

Mountain Area Workforce Development Board Incumbent Workforce OJT Policy

On-the-Job Training for Incumbent Workers is allowed by WIA when:

1. the employee is not earning a self-sufficient wage as determined by local Workforce Development Board policy;
2. all OJT Pre-Award Analysis conditions are met; and
3. the OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the WDB. (NC DWS Policy Statement Number PS13-2013, August 15, 2013)

Prior to enrollment in the Incumbent Worker OJT program the WIA eligible employee must have been in continuous employment with the company for at least six months, demonstrated excellent attendance and performance, and acknowledge a desire to accept the responsibilities associated with the new position.

Incumbent Workforce OJT contracts can only be written for full-time jobs that, during or at the end of the OJT contract, will result in:

- an increase the WIA eligible Incumbent Worker’s wage by 25% or increase the worker’s wage, or
- to an amount of at least 5 cents per hour above the “Adult Self Sufficiency Earnings Level (Six Month Earnings)” for a family of one. (e.g., currently \$11.65).

For an Incumbent Worker OJT contract to be written when the Incumbent Worker is eligible based on the income levels in the “Adult Self Sufficiency Earnings Level (Six Month Earnings) for his/her family size, and his/her wage is above “Adult Self Sufficiency Earnings Level (Six Month Earnings)” for a family of one, the 25% pay increase is required during or at the end of the OJT contract.

Clarifications and Examples:

Since OJT's are not permitted under current policy to be written for jobs paying less than \$8.00 per hour, the minimum wage to be paid at the end of an Incumbent Worker OJT would be \$10.00. The option of a 25% increase is included, because low wage workers could be excluded from the opportunity to get OJT assistance in moving to a higher paying position if an employer was required to move the client from \$8.00 to \$11.65 a 45.6% increase. If the client is earning a wage in excess of \$9.32 the percentage increase to reach \$11.65 would be less than a 25% pay increase. Increases above \$11.65 are encouraged, but not required for an Incumbent Worker OJT. Workers earning above \$11.60 per hour are not eligible for the program.

In the latter case:

when the Incumbent Worker is eligible based on the income levels in the “Adult Self Sufficiency Earnings Level (Six Month Earnings) for his/her family size, and his/her wage is above “Adult Self Sufficiency Earnings Level (Six Month Earnings)” for a family of one. An example would be - an incumbent worker with a family size of 2 (one wage earner) making \$12.00 per hour. The required 25% pay increase would be \$3.00. During, or at the end of the Incumbent Worker OJT contract, the worker's wage would have to be \$15.00 or more.

Mountain Area Workforce Development Board

Policy Statement: 2014 Number 4

April 22, 2014

Policy Regarding the Provision of Supportive Services for WIOA Youth Participants

On a case-by-case basis, line item transfers will be allowed in the Youth Program Operator's approved WIOA Budget for the provision of limited supportive services for youth participants who have a documented need and have demonstrated a determination to achieve the goals set forth in their Individual Service Strategy. In total, no more than 5% of each youth program's approved WIOA contract budget may be requested for the provision of supportive services.

A formal request must be made (email is acceptable) to the local area workforce development director using the process outlined below:

1. Prior to making a formal request for the provision of supportive services, the Youth Program Operator must document that the service(s) are not available from any other resource in the community. This documentation must be maintained in the youth participant's file.
2. The formal request must include information on the youth participant's need(s), the expected duration of the need(s), the proposed supportive service provider and the cost for the supportive service. (Note: It is the responsibility of the Youth Program Operator to adequately investigate all providers of supportive services).
3. The local area workforce development director will review each request for supportive services and provide a response within 5 working days.

Types of service that are typically needed are temporary child care, transportation assistance, work related clothing and/or tools, required physical exams or immunizations. Supportive services are limited to \$500 for each approved participant request each year.

Mountain Area Workforce Development Board

Policy Statement: 2014 Number 5

April 22, 2014

During PY-2015 the Board encourages increased focus on serving priority groups (Public Assistance Recipients, other low-income individuals, and, individuals who are basic skills deficient, Veterans and Eligible Veteran's Spouses) with WIOA Training funds. Applicants for WIOA training services who are not members of a priority group may still be served, but specific efforts will be made to provide training services to applicants who determined to be members of priority of service groups (20 CFR, 663.600).

However, it is the up to the judgment of the service provider staff to determine if the applicant is "...in need of training services and have the skills and qualifications to successfully complete the selected training program."(20CFR 663.310(b))

Policy Statement: 2014 Number 6
April 22, 2014

The Mountain Area Workforce Development Board will allow an occasional youth enrollment under the provisions of Section 664.220 of the WIA regulations. This section of the regulations allows the Board to have a policy that will allow up to 5% of the youth enrolled to have family income above the eligibility levels (70% of the Lower Living Standard Income Level-chart below) as long as the youth otherwise qualifies as having a listed barrier to employment. The procedure for approval must be made on a case by case basis by the MAWDB Director. Approvals will be limited to no more than 2% of the enrolled clients. The remaining 3% will be reserved for potential audit exceptions resulting from improper determination of eligibility.

Family Size	70% LLSIL (Six Month Earnings) (Youth Eligibility)
1	\$5,835
2	\$7,909
3	\$10,856
4	\$13,402
5	\$15,818
6	\$18,500
Each Additional Family Member Add	\$2,682

Mountain Area Workforce Development Board
Policy Statement – March 25, 2014

Mountain Local Area Policy Concerning:
WIA Services to Applicants who are Required to Register with Selective Service
and Have Not Done so by Age 26

If an applicant is still under age 26 and eligible to register with Selective Service, he may register and then be eligible to receive WIA services. <http://www.sss.gov/Default.htm>

If an applicant for WIA services is required to register with Selective Service and is not registered with Selective Service by age 26, we will not enroll him in WIA Core, Intensive or Training services. The applicant can be served under Wagner-Peyser. However, we will provide the applicant with information about how to apply for a “Status Information Letter” that may substantiate that he did not willfully refuse to register. If he receives a “Status Information Letter” from Selective Service that states they have no evidence of willful intent to refuse registration, then the applicant can be enrolled in any of the WIA services for which he is eligible. A copy of the “Status Information Letter” from the Selective Service must be retained in the participant’s WIA file as documentation of eligibility.

NOTE: If a man failed to register with Selective Service, Section 12(g) of the Military Selective Service Act allows non-registrants to receive benefits under specific conditions. As a veteran, or part-time National Guard or Reservist, the man satisfies those conditions with his DD Form 214 showing the dates of his military service, or a current military ID card if still on active duty or a member of the National Guard and Reserves. These documents serve as evidence that the man's failure to register was not knowing and willful. Therefore, men who served on full-time active duty in the U.S. Armed Forces should not be denied student financial aid, loans, or grants; vocational training under WIA; government employment; and security clearances, on the basis of their failure to register with Selective Service. As long as the man has proof of his active duty military service, such as his DD 214, or current military ID card if still on active duty or a member of the National Guard or Reserves, his subsequent failure to register should not be a bar to any benefits or programs, contingent upon registration compliance, for which he is otherwise qualified. Source: <http://www.sss.gov/FSmen.htm>

Requesting a Status Information Letter. An individual may obtain a Status Information Letter from Selective Service <http://www.sss.gov/FSmen.htm>. If the applicant believes he was not required to register – consult <http://www.sss.gov/FSwho.htm>. Documentation substantiating the reason the applicant was not required to register must be obtained prior to WIA enrollment and kept in the applicants file.

For additional details consult: <http://www.sss.gov> and/or Training and Employment Guidance Letter NO. 11-11, Change 2 http://wdr.doleta.gov/directives/attach/TEGL/TEGL_11-11_change2.pdf

Mountain Area Workforce Development Board

Staff Request for a Policy Decision

Regarding

Documentation of Eligibility for Participants Receiving Training through the Incumbent Workforce Training Grant Program

June 24, 2014

Staff Recommendation:

All employees participating in training through an Incumbent Worker Grant must meet the basic WIA eligibility criteria to be served in the Incumbent Workforce Training Grant Program. This means the Individual must be at least 18, be in compliance with Selective Service (as appropriate), and be a US Citizen or present documentation of their right to work in the US. Staff must obtain documentation to verify Date of Birth and Citizenship for all employees participating in training by securing a copy of the employee's driver's license and Form I-9 through the employer.

It is the recommendation of the Board for staff to secure a copy of the employee's driver's license and Form I-9 rather than the company attesting that they have these documents on file.

This recommendation is made because in many cases IWT grant recipients are small businesses and the costs of training for an individual can be several thousand dollars. Audit exceptions for lack of eligibility documentation can result in obligations to repay training costs.

Mountain Area Workforce Development Board

Policy Change

Increase in the limit of Work Experience Hours from 300 hours to 400 hours per year for up-to two years to be effective March 1, 2015

Currently work experience assignments are limited to 300 hours per year. Although the number of hours was somewhat arbitrarily established the reasons were:

- Subsidized work must not be permitted to interfere with an employer's normal hiring processes. If the workload demands a part-time worker the employer needs to hire someone, not use a WIA youth for the job. Work Experience should not be seen as a government subsidy of an employer's workforce.
- Work experience hours must be kept at a level that reflects an employer's willingness to provide a youth participant with a valuable opportunity to learn about the expectations, of the work environment. And, to provide a youth who has little or no work experience a "work history" and hopefully a letter of reference to add to his/her resume.
- Too many hours of work experience, especially evening hours during the school year, can interfere with academic performance and/or attendance.
- The work experience investment in an individual should be kept relatively low so more youth can be served.

The reasons for the request in the policy change are:

- The extremely low income levels that govern youth eligibility reflect the hardship of the family/household, if the youth is not homeless and additional income is very important to the participant and those he/she is living with.
- At 400 hours the evening hours of employment can still be scheduled so that the work experience won't interfere with attendance or performance. Youth programs have rules that withhold work hours if attendance and academic performance aren't maintained.
- Additional hours would enable youth to earn extra income in the period between the end of the school year and June 30.
- The extra hours allow the student to learn more of the occupational skills associated with their assignments. Employer (especially private sector employers) might be more willing to accept work experience students if they had longer assignments on their worksites and the increased hours give participants a better chance to prove themselves as reliable and productive.

Under the Workforce Innovation and Opportunity Act (WIOA) there will be an increased emphasis on work-based learning and adding an "academic and occupational skills education" component to the work experience assignment. This will increase the importance of work experience assignment and increase the impact of the work experience on the participant's skill development.

Mountain Area Workforce Development Board

Policy Statement: 2016 Number 1

January 26, 2016

Policy Statement Regarding Applicant Self-Attestation for Eligibility for Workforce Innovation & Opportunity Act Adult, Dislocated Worker, and Youth Programs

Pursuant to a mandate from the United States Department of Labor and the NC Department of Commerce, Division of Workforce Solutions, the Mountain Area Workforce Development Board does hereby enact this Self Attestation Policy Statement. For all verification where Applicant Self-Attestation is allowed, self attestation is to be used exclusively as a last resort and only after best efforts and all other forms of verification have been exhausted.

Applicants for WIOA program services must exhaust all options available to them in providing supporting documentation for the eligibility of programs. In those instances where documentation is absolutely unavailable to applicants seeking enrollment into WIOA programs the Local Area allows self-attestation of the information when that is allowable in the NCWorks System.

If the self-attestation is allowed by the NCWorks System, the program operator/case manager will use the appropriate form for the WIOA program to which the applicant is applying to for services to document that element of eligibility for program services. All verification documents must be typed or in ink. The use of white-out/correction tape is prohibited. Errors should be lined through, initialed and correct information added. The applicant shall sign and date the relevant attached Self Attestation form to attest, under the penalty of perjury, that the information provided is accurate and true to the best of the applicant's knowledge and belief; and that the applicant will cooperate fully if asked to document eligibility. All self-attestation forms will be maintained in the WIOA participant's file and may be subject to review by the Local Area.