

Western Virginia Workforce Development Board Workforce Center & Services Committee

November 6, 2019, 2:00pm Virginia Career Works – Roanoke Center 3601 Thirlane Road, Suite 2, Roanoke, VA 24019

I.	Call to Order	Crystal Hall
II.	Public Comment	
III.	Meeting Minutes Approval – August 7, 2019	Crystal Hall
IV.	Old Business	Leah Gibson
	 GO Virginia Grant(s) Update Pathways to the American Dream Grant Update WIOA Title I Youth Program Update WIOA Title I Training Funding Limitations 	
<u>v.</u>	WIOA Title I Provider Performance	Crystal Hall
VI.	New Business	Leah Gibson
	 New & Updated Policies Economic Equity Grant Application Workforce System/Center MOU/IFA OnRamp Program Update Opportunity Youth Plan 	
VII.	Upcoming Meetings	
	 Next WCSC Meeting February 5, 2019 WVWDB Meeting December 13, 2019 9:00am Virginia Career Works – Roand 	
VIII.	Adjournment	



Western Virginia Workforce Development Board Workforce Center & Services Committee

August 7, 2019 – 2:00 PM Virginia Career Works – Roanoke Center 3601 Thirlane Road NW, Suite 2, Roanoke, VA 24019

Committee Members	Present
Joseph Brinley	
Abby Hamilton	
Emmanuel Doss	X
Crystal Hall, Chair	X
Mary Ann Gilmer	X
Dr. Milan Hayward	X
Kathy Hodges	
Katherine Holcomb	X
Karen Michalski-Karney	
Joyce Kessinger	X
Angela Oginz, Alternate for Steve Martin	X
Jessie McKeon, ex-officio	X
Jo Nelson	

Board Staff	Present
Leah Gibson	X
Jill Quinlan	X
Mark Holman	X

CALL TO ORDER

Crystal Hall called the meeting to order at 2:02 PM.

PUBLIC COMMENT

There were no comments from the public.

MEETING MINUTES APPROVAL – May 1, 2019

The May 1, 2019 Workforce Center & Services Committee Meeting minutes were presented to the committee.

Workforce Center & Services Committee Action: Mary Ann Gilmer made a motion to approve the minutes as presented. Joyce Kessinger seconded the motion. The motion was approved.

OLD BUSINESS

GO Virginia Grant Update

Leah Gibson updated the Committee on the GO Virginia project with Region 2000 and the New River/Mt. Rogers Workforce Development Board. The CareerQuest expo event for 7th graders in the broader super-region will be held September 18 – 19, 2019 at the Salem Civic Center. Many regional schools have already confirmed their attendance. Board staff are working with local economic development staff to obtain attendance commitments from local businesses. Staff are also seeking donations from individuals or organizations that are interested in sponsoring the event and are open to any additional suggestions from the committee. Volunteers will also be needed for both days of the event, which will come in part from Virginia Career Works staff but will require additional volunteers. Committee members were invited to volunteer for the event.

Pathways to the American Dream Grant Update

Jill Quinlan provided the committee with an update on the progress made thus far in the Pathways grant. The grant is currently in its third year of operation locally, and Jill is more than halfway towards her enrollment goal for the year. Most of this year's enrolled participants have successfully completed training, earned credentials and gained employment with a median wage of \$24.00. Jill is meeting with Virginia Western and Dabney S. Lancaster Community Colleges in the coming weeks for additional enrollment opportunities. Two success stories of participants of the program were also shared with the committee.

WIOA TITLE I PROVIDER PERFORMANCE

A chart detailing enrollment goals for PY2018 and the actual enrollment results was shared in the agenda packet with the committee. Formal performance measures for PY2018 had not yet been received from the state, so that data will be reviewed at the next committee meeting. Leah also shared that as part of Ross' contract for the provision of the Adult & Dislocated Worker programs, profit was eliminated for these programs when the contractor overspent budgeted funds in January 2019. The contracted budget for the Youth program, did include allowable profit to be earned, however due to not meeting the mandated 20% work experience expenditure, no profit was paid out to Ross for the program year.

NEW BUSINESS

WIOA Title I Youth Program Changes

Leah Gibson introduced Mark Holman, Jr. and his new role as the Youth Program Manager. Mark expressed his gratitude and enthusiasm to be on board. Leah also shared with the committee that Mark will be meeting with partners that provide youth programs in the coming weeks, to develop relationships and improve referrals and co-enrollment opportunities. RFPs had been released for the provision of the Youth Elements. Ross will continue to operate the Youth program through September 2019.

Policy Updates

Leah Gibson reviewed policy updates with the committee. The Incumbent Worker Training, Individual Training Accounts, On the Job Training and Work Experience contracts were being updated to remove the specific target occupations, but rather reference the occupations deemed in-demand per the local plan, as the local plan is updated every few years. The File & Information Maintenance policy was being updated to remove the language requiring case

management staff to print case notes for the paper file. The Priority of Service policy was being updated to include language of how Board staff will provide oversight to ensure Priority of Service is being provided to those covered group. The state had reviewed the Priority of Service policy to ensure it meeting requirements.

Workforce Center & Services Committee Action: Crystal Hall made a motion to approve the policies as presented. Joyce Kessinger seconded the motion. The motion was approved.

Eligible Training Provider Renewal Applications

Leah Gibson reviewed the Eligible Training Provider SOP with the committee, as implemented last year per the guidance of the Board. The group reviewed the renewal application as presented in the packet. One typographical error was corrected, for the program name of the Roanoke Valley Nurse Aide provider. The group discussed the SOP in place and agreed to move forward with the current process, as approved.

Workforce Center & Services Committee Action: Joyce Kessinger made a motion to approve the renewal applications as presented, communicating probationary status of those programs or providers that are not meeting the mandated 50% completion rate and/or 65% credential rate, set by the state. Milan Hayward seconded the motion. The motion was approved.

WIOA Title I Training Funding

Leah Gibson brought the current Limited Funding policy to the committee to review, as per previous meeting minutes. The group discussed the current budgetary limitations for training expenditures as well as any specific training programs that exceeded current caps on individual training accounts. Board staff made a recommendation to allow the Limited Funding Policy to expire, and rather change the Individual Training Account policy to limit ITA maximum to \$3500 per participant, with waivers allowable on a case by case basis with justification. Further, CDL Training through Virginia Western Community College would not be able to receive more than 25% of the Occupational Skills Training budget line item, per program, per year. The committee requested to keep this topic as a standing agenda item and review it at each quarterly meeting. Katherine Holcomb requested that Board staff reach out to CDS to ask that tuition cost be lowered.

Workforce Center & Services Committee: A motion was made by Mary Ann Gilmer to accept the staff recommendation of policy changes and maximum of 25% of budgetary line item to CDL training through Virginia Western. Joyce Kessinger seconded the motion. Dr. Milan Hayward abstained. The motion was approved.

UPCOMING MEETINGS

Leah Gibson asked the Committee to review their calendars to set the next meeting date. The Committee agreed on the following dates & times, all to be held at the Virginia Career Works – Roanoke Center conference room:

- 1. November 6, 2019 2:00pm
- 2. February 5, 2019 2:00pm
- 3. May 6, 2019 2:00pm

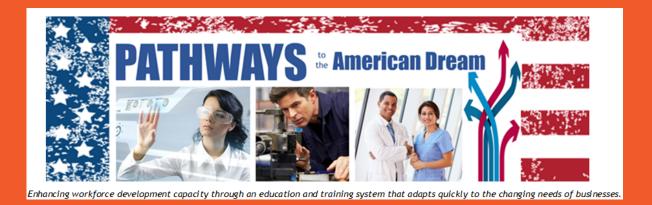
The next meeting of the full Western Virginia Workforce Development Board will be September 26, 2019 at the Green Ridge Recreational Center.

ADJOURNMENT

Crystal Hall adjourned the meeting at 2:52 PM.

* as of 10/31/2019

PATHWAYS Deliverables	Period	Project Total Goals	Project Total Actual	Area 3 Goals	Area 3 Actual
	Year 1	200	290	40	26
	Year 2	300	385	60	45
Participants Served	Year 3	400	289	80	51
	Year 4	200	0		0
	Total	1100	964		122
	Year 1	127	272	34	22
Total Participants Completing	Year 2	234	342	51	44
Education/Training Activities	Year 3	319	250	68	49
(85%)	Year 4	255	0		0
	Total	935	864		115
Total Participants Completing	Year 1	112	271	30	21
Education/Training Activities	Year 2	207	334	45	44
AND Receive a Creditial or	Year 3	281	250	60	49
Degree (75%)	Year 4	225	0		0
Degree (75%)	Total	825	855		114
Total Number of Un-/Under-	Year 1	84	195	23	12
Employed who Complete	Year 2	155	285	34	36
Training Activities and Obtain	Year 3	211	200	45	45
Employment	Year 4	169	0		0
(75% of total)	Total	619	680		93
Total Number of Incumbent	Year 1	34	39	9	7
Workers who Complete	Year 2	62	24	14	6
Training Activities that	Year 3	84	2	18	0
Retain/Advance	Year 4	68	0	_	0
(90% of total)	Total	248	65		13



Serving 34 Jurisdictions from Four Workforce Development Areas in Southern and Southwest Virginia





SOUTHWEST REGION

Number Served: 16

Number Completed Training: 14
Number Earning Credentials: 12

Number Employed: 11

Average Wage at Employment: \$16.11 Total Pathways Investment: \$21,815

Number Negative Exits: 1



Number Served: 121

Number Completed Training: 93
Number Earning Credentials: 80

Number Employed: 70

Average Wage at Employment: \$17.65
Total Pathways Investment: \$148,212

Number Negative Exits: 18





NEW RIVER | MOUNT ROGERS REGION

Number Served: 35

Number Completed Training: 33
Number Earning Credentials: 33

Number Employed: 29

Average Wage at Employment: \$17.54

Total Pathways Investment: \$61,326

Number Negative Exits: 3



Number Served: 118

Number Completed Training: 118
Number Earning Credentials: 116

Number Employed: 96

Average Wage at Employment: \$21.77
Total Pathways Investment: \$121,640

Number Negative Exits: 13



Number Served: 146

Number Completed Training: 139
Number Earning Credentials: 133

Number Employed: 130

Average Wage at Employment: \$21.96

Total Pathways Investment: \$252,123

Number Negative Exits: 6



BLUE RIDGE REGION



WE'LL TAKE YOU THERE

Number Served: 63

Number Completed Training: 60 Number Earning Credentials: 54

Number Employed: 55

Average Wage at Employment: \$24.33 Total Pathways Investment: \$100,060

Number Negative Exits: 4





WEST PIEDMONT REGION

Number Served: 94

Number Completed Training: 87
Number Earning Credentials: 83

Number Employed: 71

Average Wage at Employment: \$22.34 Total Pathways Investment: \$78,448

Number Negative Exits: 9

DCC

Danville Community College

Number Served: 18

Number Completed Training: 18
Number Earning Credentials: 17

Number Employed: 11

Average Wage at Employment: \$21.20

Total Pathways Investment: \$14,472

Number Negative Exits: 1



Number Served: 611

Number Completed Training: 562 Number Earning Credentials: 528

Number Employed: 473

Average Wage at Employment: \$20.36 Total Pathways Investment: \$798,096

Number Negative Exits: 55

Jenny Bolte, Deputy Director, New River/Mount Rogers Workforce Development Board

Jenny.Bolte@vcwnrmr.com * (540) 838-9400

www.VCWNewRiverMtRogers.com

Pathways to the American Dream is a \$7,500,000 project. \$6,000,000 (75%) is provided through a Federal grant from the United States Department of Labor – Employment and Training Administration. \$1,500,000 (25%) is provided through other sources, including leveraged state and local funds.text



BLUE RIDGE REGION

Title: Individual Training Accounts (ITA)	Related Forms: Yes
Effective Date: 1/27/2017	Revised Date: 9/26/2019

Purpose

The purpose of training is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. This policy is intended to define and establish parameters for Individual Training Account (ITA) development and expenditures.

Reference

Workforce Innovation and Opportunity Act (WIOA) Title 1 00-8 Virginia's Training Voucher System under WIA VWL #05-08, Individual Training Accounts for Out-of-School and/or Older Youth

Policy

A WIOA-eligible registrant is enrolled in a training program if the Individual Employment Plan (IEP) supports that the training is necessary to transition the participant into the workforce. The training must support the stated purpose of WIOA and be in accordance with the description of training as contained in the Act. Whenever feasible, training vendors will be requested to allow participants to receive credit for required courses when equivalent courses have been completed and can be documented from other training institutions. Additionally, costs associated with College Level Examination Program (CLEP) Testing will be treated as a training cost if the testing relates to the curriculum of study.

Procedure

Eligibility

All recipients of training funds must be eligible based upon criteria established under the Act. WIOA requires the coordination of training costs with funds available under other grant assistance (Section 134). WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources, including PELL Grants, to pay the costs of their training or require assistance beyond that available under grant assistance from other sources, including PELL Grants but excluding loans, to pay the costs of such training to avoid duplication of payment. Individuals must maintain an active application status for PELL assistance. The exact mix of funds shall be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid, and that necessary supportive services are available so that the training can be completed successfully. The total school budget will be supplied by the vendor based upon a formula used by institutions that determine financial aid. This total school budget is not inclusive of childcare assistance.

Occupational Areas of Training

The training provided through ITAs is for the sole purpose of facilitating transition into the workforce. All training will be for occupations identified as in demand in the labor market and determined to be of priority by the Western Virginia Workforce Development Board (WVWDB) in the Local Plan.



Staff may request a waiver for participants that are interested in training outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by the WVWDB Director prior to approving funding for the participant. Waiver documentation must include, at a minimum:

- justification within the participant's IEP identifying occupation interest and/or aptitude;
- barriers to employment and/or training in the target sectors and occupations;
- and local labor market information including LMI data as well as at least 3 different current job openings paying a self-sufficient wage (as defined in our Eligibility policy) for the occupation connected to the training.

These items must be attached to the waiver request form to the WVWDB Director. Waivers may be available for no more than 5% of funds budgeted annually by line item and by program (i.e.: 5% of the Adult ITA budget, etc.).

Training funded specifically for Commercial Driver's License (CDL) may not exceed 25% of the total occupational skills training budget, per program, per year.

Training Selection

Training will be provided for priority occupations only as determined by the Board by an institution or organization certified as meeting the criteria and having completed the procedures outlined in the Eligible Training Provider Certification policy. Participants have choice of any approved provider and approved program that is on the statewide ETPL housed within the system of record, VAWC. Approval for local funding, however, will be based on criteria listed within this policy as well as funding limitations within supportive services that may be required for trainings.

Length of Training

The purpose of training services is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. Training length will vary according to the type of training and the requirements outlined in the vendor agreement. Because entering or returning to the workforce is a priority under WIOA training, training cannot exceed more than 24 calendar months. Training should lead to an industry-recognized certification and employment that earns a sustainable wage. Participants whose IEP includes training lasting more than 24 months must request a waiver from the WVWDB Director PRIOR to beginning the training and expenditure of funds. Participants whose training was planned for less than 24 months but who require additional time to complete the program of study must request a waiver.

Repeat Training

The WVWDB will NOT provide funding for courses/programs previously funded but not successfully completed.

Cost Limitation

The local WVWDB limits training cost to no more than \$3,500 per participant within a twelvemonth period, except as approved by the WVWDB Director prior to the expenditure of funds.



Funding of training and supportive services combined may not exceed a total of \$6,000 in a 12-month period. All WIOA registrants will be made aware of any excess cost of training not covered by the program for which they will be responsible. Program operators are expected to work closely with participants to determine the individuals' ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the needs of the participant while using WIOA funding in the most efficient manner possible.

Administration

All requests for ITA funding must be supported in the participant's IEP. Contact with the participant is required. All participants are also required to complete performance reviews with their case manager on a quarterly/ semester/module basis in accordance with the timeframes outlined on the IEP. ITA funding is authorized on a semester/quarterly/module basis and requires documentation that the participant has successfully completed previous work. Discontinuation of funding for students who are not performing or demonstrating satisfactory progress toward completion of training goals is allowed. Students are expected to maintain no less than a cumulative 2.0 grade point average for the year in order to continue to receive WIOA funding. Invoices from training providers must be placed in customer files with vouchers to substantiate payments. Vouchers must have all signature lines successfully signed prior to payments being made. Payment are made to training providers on behalf of an individual participant. Payments are not made to participants directly and are not made as reimbursements for expenses paid by participants prior to program enrollment and/or approval from program operator.

Waivers

A waiver to the above maximum specifications may be requested from WVWDB director on a case-by-case basis. Waivers must be submitted and approved by the Director prior to the expenditure of funds. The necessity for waiver must be sufficiently justified and documented for a waiver to be approved. The Executive Director may approve exceptions to the cost limit up to \$8000 maximum limit for the following: computer & information systems training and certification; healthcare training and certification; and manufacturing & processing training and certification. Please note, the eligible training provider who receives the maximum waiver amount of WIOA funds to serve a WIOA participant will need to include certification testing and placement into employment as part of their training cost.

Related Forms:

Waiver Request

Training Policy & Selection

Training Plan

Training Policy & Selection

$\frac{ Workforce\ Innovation\ and\ Opportunity\ Act\ (WIOA)\ Title\ I\ Adult\ \&\ Dislocated\ Worker\ Programs\ Performance\ Report\ Participant\ Goals^*$

Adult Program

Participants Served Goals Carryover Participants 86 New Enrollment Goal 185 Total Participant Goal 271

	Participants by Month						
Month	New Enrollments	Total Participants	% Enrollment Goal				
July	10	96	5%				
August	22	118	17%				
September	8	126	22%				
October							
November							
December							
January							
February							
March							
April							
May							
June							

Participants by Locality*				
Locality	Number	%		
Alleghany County	2	5%		
Botetourt County	1	3%		
Covington City	6	15%		
Craig County	0	10%		
Franklin County	4	45%		
Roanoke City	18	13%		
Roanoke County	5	13%		
Salem City	2	5%		
Other	2	5%		
TOTAL	40	100%		

 $^{^*}$ as of September 30, 2019, 25% through the year

Dislocated Worker Program

Participants Served Goals				
Carryover Participants	76			
New Enrollment Goal	65			
Total Participant Goal	141			

	Participants by Month							
Month	New Enrollments	Total Participants	% Enrollment Goal					
July	7	83	11%					
August	4	87	17%					
September	5	92	25%					
October								
November								
December								
January								
February								
March								
April								
May								
June								

Participants by Locality*				
Locality	Number	%		
Alleghany County	0	0%		
Botetourt County	1	6%		
Covington City	0	0%		
Craig County	0	0%		
Franklin County	3	19%		
Roanoke City	3	19%		
Roanoke County	3	19%		
Salem City	2	13%		
Other	4	25%		
TOTAL	16	100%		

<u>Workforce Innovation and Opportunity Act (WIOA) Title I Adult & Dislocated Worker Programs Performance Report</u> *Financial Expenditure Goals*

Adult Program

	Contracted	Amount	Direct Client Expenditures Budget				
	\$400,000.00		\$183,629.99				
Month	Total Expenditures	% of Goal	Total Expenditures	Total Obligations	% Spent	% Spent & Obligated	
July	\$10,278.44	3%	\$270.00	\$0.00	0%	0%	
August	\$31,867.75	11%	\$14,905.00	\$0.00	8%	8%	
September	\$19,969.13	16%	\$7,055.00	\$0.00	4%	4%	
October							
November							
December							
January							
February							
March							
April							
May							
June							

Dislocated Worker Program

	Contracted	l Amount	Dir	ect Client Expe	nditures Bud	get	
Month	\$300,000.00		\$146,779.70				
Wionth	Total Expenditures	% of Goal	Total Expenditures	Total Obligations	% Spent	% Spent & Obligated	
July	\$17,687.68	6%	\$3,500.00	\$0.00	2%	2%	
August	\$21,181.39	13%	-\$3,651.00	\$0.00	0%	0%	
September	\$11,934.00	17%	\$3,751.00	\$0.00	2%	2%	
October							
November							
December							
January							
February							
March							
April							
May							
June							

Financial Expenditure Requirements Performance

Requirement: A minimum of 40% of total expenditures must be spent on Training activities

Total WVWDB Adult & Dislocated Worker Expenditures	\$10,269.03
Total Ross Adult & Dislocated Worker Expenditures	\$112,918.39
Total Ross Adult & Dislocated Worker Training Expenditures	\$25,830.00
% Training Expenditures	21%

^{*}As of September 30, 2019, 25% through the year



Title: Individual Assessment	Related Forms: No
Effective Date:	Revised Date:

Purpose:

The purpose of this policy is to establish guidelines for the completion of assessments for WIOA Title I programs.

References:

WIOA Law §129(c)(1)(A) & 134(b)(2)(A) 20 CFR §678.420 & §681.420

Policy:

During the enrollment process, individuals must receive an assessment. Assessments are a holistic, ongoing process and should not be viewed as a one-time event. Assessments provide valuable information to decipher the best way to guide towards an employment goal. The results of assessments must be explained to an individual and analyzed to provide guidance in determining action steps and services to be included in the Employment Plan. Information obtained during assessments should be utilized to provide direct linkages to services within the workforce system and community as well.

Procedure:

Initial Assessment

The initial assessment is completed through conversations to determine appropriate services and coordinated referrals with partner agencies to assist an individual in achieving their goals. The Initial Assessment is part of the overall intake process and includes informal verbal discussion the initial determination of the following:

- Identification of strengths.
- Identification of workplace skills.
- Career interests.
- Work values.
- Identification of prior work history.
- Family situation.
- Service needs.
- Basic skills.
- Formal assessments, such as ACT® WorkKeys® Curriculum™ Placement Quiz, WorkKeys
 Assessments, Best Plus™, or Best Literacy™, are not required but may be used based on the
 needs of the participant.

Objective Assessment

The Objective Assessment include a further analysis of the Initial Assessment results and formal testing as it applies to the Employment Plan. This can include the following:



- Basic skills
 - WorkKeys Curriculum Placement Quiz.
 - WorkKeys Assessments.
 - TABE®.
 - Best Plus or Best Literacy assessments.
- Identification of strengths.
- Identification of workplace skills.
- Career interests.
- Work values.
- Identification of prior work history.
- Family situation.
- Service needs.

The results from an Objective Assessment assists in the development of a WIOA Title I participant's Employment Plan. Formal assessment results within the last six months, provided by the participant or a partner agency, are acceptable to use in place of formal Objective Assessments.

Reasonable Accommodations

If an assessment accommodation is needed, it is important to have this in place prior to taking the assessment. Please refer to the organization or company that developed the assessment in order to determine appropriate accommodations for that specific assessment.

Local Implementation

- TABE testing is provided at no cost by Title II Adult Education partners within the local workforce development area and should be used to identify basic skills levels for participants.
- TABE testing should be completed for participants that lack documented or demonstrated experience and/or success in a vocational or post-secondary training course
- A career interest/aptitude assessment is required in cases of participants attending training to justify potential success (i.e.: CareerScope, Virginia Wizard, etc.). The Western Virginia Workforce Development Board will approve of the use of specific assessments, as needed.



Title: Data Validation	Related Forms: No
Effective Date:	Revised Date:

Purpose:

The purpose of this policy is to establish guidelines for the implementation of data validation for Workforce Innovation and Opportunity Act (WIOA) program operation at the local level.

References:

Workforce Investment Act of 1998 (WIA)
Workforce Innovation and Opportunity Act (WIOA)
TEGL 3-03
TEGL 9-07

TEGL 06-14, Attachment A

Policy:

The Western Virginia Workforce Development Board must ensure to the maximum extent feasible the accuracy of the data entered into the system of record, the Virginia Workforce Connection (VaWC). The WVWDB, and its' contractors, as applicable, will comply with state and federal reviews of local records as required. The data validation initiative covers both the accuracy of aggregate reports submitted to ETA on program activity and performance outcomes and the accuracy of individual data elements.

Procedure:

This process assesses the accuracy of data records. Data element validation is performed by reviewing samples of participant records against source documentation to ensure compliance with federal definitions.

Not all data elements are subject to validation. Data elements are selected for validation based on three factors:

- Feasibility Data elements can be validated only when it is practical and efficient
 to locate and examine supporting evidence within the records. Therefore, such items
 as race, ethnicity, and gender will not be validated because these data elements are
 self-reported by participants, and it is not efficient to locate the participant to
 document these characteristics. It is also not practical to validate for data entry
 errors.
- 2. **Risk** The process for validating data elements is based partly on the likelihood that the data element may be inaccurate. Data elements involving human judgment are more prone to error than data elements that do not involve human judgment. For example, determination of employment based on supplemental sources is more likely to be in error than determination of employment from wage records.



3. **Importance** – Data elements are selected for validation based primarily on their importance to the integrity of the ETA 9091 report (Annual Report).

The ETA standardized software generates a sample of the participant records and data elements the State or grantee will validate. Data element validation samples are selected from a sample of offices within the State, rather than from every office.

Two sampling techniques are used:

- Clustering The software selects the sample of exiters from a relatively small number
 of locations within the State where source documentation is stored. This approach
 reduces the burden that on-site validation imposes on the State by limiting the number
 of locations to visit.
- **Stratification** Cases that have a higher potential for error that will affect performance (positive employment or education outcomes) and more data elements to be validated are sampled in greater proportion than cases with a reduced chance of error (negative employment or education outcomes) and fewer elements to validate.

Once the State has validated the sampled records, the software weights the results of the validation to correct for over- and under-sampling resulting from the clustering and stratification.

The data element validation includes assembling worksheets arrange visits to local offices. If appropriate, state staff should conduct the validation onsite except for data stored at the state level, i.e., wage record information. States have the flexibility to determine the most efficient source to use to validate the information when more than one source is specified. State staff shall notify local staff well in advance of when the onsite validation, if any, will occur to ensure local staff is available to assist in the validation. State staff shall also inform local staff which records will be sampled.

To ensure integrity and authority of the data validation process, Virginia completes the data validation process through the Virginia Community College System (VCCS). The state monitor who is assigned to the local office is responsible for conducting the review of participant records, and the submittal of the annual data validation report to ETA. Participant records will be reviewed in both paper and electronic format.

Accuracy Standards

States and grantees will be held accountable for meeting acceptable levels and will be required to address any issues concerning data accuracy. States and grantees that fail to meet accuracy standards will receive technical assistance from ETA and will develop and implement a corrective action plan. Data that do not meet accuracy standards will not be acceptable for measuring performance and may keep the State or grantee from being eligible for incentives that are awarded based on performance data.

Upon completion of data validation, the results will be shared with the local area. In incidents where acceptable levels are not met, technical assistance may be provided. Depending on the



BLUE RIDGE REGION

degree of deficiency, the State may require a corrective action plan from the local area.

Data Elements and Source Documentation

The elements required for data element validation focus on eligibility, performance, and services. See the following link for a list providing federal guidance regarding what types of source documentation are acceptable to validate key data elements related to WIA/WIOA program eligibility, services and outcomes:

http://wdr.doleta.gov/directives/attach/TEGL/TEGL-6-14-Attachment-A-Acc.pdf.

Only one of the documents listed for each element is required for validation. However, if multiple sources are collected for the same data element and the sources conflict, the most reliable source should be used to determine if the element passes or fails. For example, for School Status at Participation copies of records from an educational institution are a more reliable source than participant self-attestation. Special attention must be paid to the following general definitions for certain types of source documentation:

- **Cross-Match:** A cross-match requires validators to find detailed supporting evidence for the data element.
- **VaWC:** Unless otherwise noted, VaWC refers to specific, detailed information that is stored in the State's information system that supports an element. An indicator, such as a checkmark on a computer screen, is not acceptable source documentation in and of itself. For example, VaWC is an acceptable source documentation for date of first training service. To be an acceptable source to validate the date of first training service, in addition to the date of first training, VaWC should have information about the type of training and the organization that provided the training. This detailed information makes valid source documentation and makes it unnecessary for such states to validate this data element in local offices.
- **Self-Attestation:** Self-attestation occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are:
 - o the participant identifying his or her status for permitted elements and
 - o signing and dating a form attesting to this self-identification.
- **Case Notes:** Case notes refer to either paper or electronic statements by the case manager that identifies, at a minimum, the following:
 - o a participant's status for a specific data element,
 - o the date on which the information was obtained, and
 - the case manager who obtained the information.



Title: Adult, Dislocated Worker and Youth Eligibility Related Forms: Yes
Effective Date: 1/27/2017 Revised Date: 10/8/2018

Purpose:

To ensure proper eligibility determinations for participation in WIOA programs and receipt of WIOA funds.

References:

VWL #15-02 Eligibility Guidelines

VWL 15-02 Attachment A: WIOA Adult Eligibility

Attachment B: WIOA Dislocated Worker Attachment C: WIOA Youth Eligibility

Attachment D: Verification and Documentation for WIOA Eligibility

Attachment E: Selective Service Requirements Attachment F: Family Size/Family Income

Attachment G: Self-Certification and Telephone/Document Inspection Verification

Requirements

Attachment H: WIOA Definitions for Title I Eligibility

Attachment I: WIOA Eligibility Checklist for Adults and Dislocated Workers

Attachment J: WIOA Eligibility Checklist for In-School Youth Attachment K: WIOA Eligibility Checklist for Out of School Youth

WIOA Sections 170 and 129

Policy:

It is the policy of the Western Virginia Workforce Development Board (WVWDB) to follow all federal guidelines and state guidance in determining eligibility for participants in and recipients of WIOA programs. The WVWDB and its' Service Providers will use their guidance to ensure accurate eligibility determinations are made. It is the current policy of the Western Virginia Workforce Development Board (WVWDB) to opt out of providing services to 5% of youth served that do not meet the income criterion. If this becomes a process we choose to participate in in the future, a policy will be created regarding these participants.

Procedure:

The state provided eligibility checklists must be in case files and completed accurately. Per state guidance, a letter from HUD verifying that an individual is currently receiving a rent subsidy is substantial verification for low income status, as HUD has already verified income. For citizenship verification, the actual I-9 form does not need to be in the file, rather the documentation from the I-9 form. Clients should date all forms when they sign them as indicated on forms, only those without a date line are not required to be dated the date they are girered.

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Self-Sufficiency Determination

To better serve the adult population of our area, adults who are a member of a family whose income exceeds the Lower Living Standard Income Level (LLSIL) but not in excess of 175% may also receive WIOA services as an established priority group. Additionally, income self-sufficiency of a Dislocated Worker will be calculated as the higher of 175% of the LLSIL or 80% of the layoff wage. The LLSIL is established annually by the Department of Labor and can be found at https://www.doleta.gov/llsil/.

Unlikely to Return Determination

Unlikely to obtain employment in a previous industry or occupation within six (6) months from date of termination or layoff due to general economic conditions of the area. Consideration will be given to declining industries or occupations or obsolete individual skills in a demand occupation or industry that could preclude an individual from being competitive or finding reemployment in the current occupation without the upgrading of skills.

Suitability

<u>Suitability must be determined through the assessed ability and the perceived personal commitment of the participant to attend activities, to successfully complete these activities and to acquire employment and/or post-secondary/advanced skill placement. While persons may be fully eligible for WIOA Title I programs, they may not be suitable pending resolution of immediate issues. Examples of an individual who may not be suitable include:</u>

- An individual who does not meet eligibility requirements;
- Persons requiring extensive support beyond that of the WIOA Title I Programs;
- Persons whose needs are better served by another agency or program:
- Persons whose lives are in immediate crisis & who cannot participate at the time of determination;
- Persons who cannot commit time sufficient for participation in WIOA Title I Programs;
- Persons who consistently fail to attend scheduled meetings or appointments.

Should an applicant be determined not suitable, there must be proper documentation of the reason for denial of access to the program. Case notes must be entered to support the suitability determination.

Youth in Need of Additional Assistance

Youth identified during the initial intake assessment and eligibility process as meeting one of the following may be considered an individual (including a youth with a disability) who requires additional assistance to complete an education program or secure and hold employment:

- Lacking work experience for those aged 17 years old and above
- Having difficulty keeping employment meaning an individual aged 17 years or older who
 has not worked for the same employer for longer than 3 consecutive months in the prior
 twelve months
- Residing in a single parent household

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- Residing in, or has resided in during the past 2 years, a residential placement facility, including a detention facility, substance abuse treatment facility, emergency shelter, psychiatric hospital, halfway house or foster group home (this must be verified with documentation from the facility, verbal or written)
- Living with a family member in the household who is unemployed or has lost their job during the past 12 weeks (includes spouse, parent or sibling over 18)
- Natural disaster evacuees

The case file must include documentation as to how the determination was made (i.e. official documents, verification from employer or educator, etc.). Documentation must also include a well-articulated statement via case note by the Case Manager that clearly defines and explains the rationale for the decision to use this barrier(s) and how participation in the services selected will support the Youth's chances for securing employment or completing an education program in order to secure employment.

Additional Documentation Requirements

The state provided eligibility checklists must be in case files and completed accurately. Per state guidance, a letter from HUD verifying that an individual is currently receiving a rent subsidy is substantial verification for low-income status, as HUD has already verified income. For citizenship verification, the actual I-9 form does not need to be in the file, rather the documentation from the I-9 form. Clients should date all forms when they sign them as indicated on forms, only those without a date line are not required to be dated the date they are signed.

Active clients must be contacted at least once every 30 days. Cases should be updated in VAWC with a case note reflecting the individual contacted, the conversation, information received & provided, and actions taken following the contact. Case notes within VAWC must be entered timely, within 10 days of the contact date. These case notes should be entered while a case is active as well as during follow-up, to document each contact or attempted contact with the client. Telephone call log books should not be kept alone, a case note should be entered for every call made & received with clients. If kept, they must be stored in locked cabinets and surrendered to the Board with closed files.

For those items that can be verified by self-attestation, self-attestation can only be used as verification as a last resort, when absolutely no other source of verification is available. The reason and justification for using self-attestation & documentation of attempts to verify with acceptable sources must be made in a case note.

For eligibility purposes, barriers to education/employment should be documented following guidance found in Federal, State and local policy. All barriers should have tangible documentation found within the physical case file and/or the electronic system of record (VaWC).



Related Forms:

Adult and Dislocated Worker Eligibility Checklist

Out of School Youth Eligibility Checklist

In School Youth Eligibility Checklist

Telephone Verification / Document Inspection Form

Supplemental Application Questionnaire

Social Services Verification

Self-Certification Form

Offender Verification

Employment Verification

DRS Disability Verification

Consumer Report Release

Consent to Exchange Information

Follow Up Agreement

Adult/Dislocated Worker IEP

Youth IEP

VEC Release Form



Title: Follow-Up Policy Related Forms: No
Creation Date: 6/21/2019 Revised Date:

Purpose:

The Workforce Innovation and Opportunity Act (WIOA) Title I requires that follow up services must be made available to—participants for up to 12 months following the first day of employment and/or case closure. The goals of follow-up services are to ensure job retention, wage gains and career progress for participants who have been referred to unsubsidized employment.

References:

TRAINING AND EMPLOYMENT GUIDANCE LETTER WIOA NO. 26-16 Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act

PUBLIC LAW 113-128, Workforce Innovation and Opportunity Act

TRAINING AND EMPLOYMENT GUIDANCE LETTER WIOA NO. 10-16
ATTACHMENT 1 Definitions of Terms Related to the Performance Accountability
System

Policy:

A participant in a WIOA Title I program is exited from the program when a participant is no longer receiving services from any DOL-administered program for at least 90 days and no future services are planned. Once an individual has exited from the program, they will then fall into a Follow-Up period, for up to 12 months following the last date of service (exit date).

Procedure:

Services

Follow-up services for Adults & Dislocated Workers include, but are not limited to:

- · Additional career planning;
- Counseling regarding the workplace;
- Contact with the participant's employer, including assistance with work-related problems that may arise;
- Peer support groups;
- Information about additional educational opportunities; and
- Referral to supportive services available in the community.

Follow-up services for Youth are limited to the following:

- Supportive services;
- · Adult mentoring;

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Financial literacy;

· Labor market information; and

· Transition to post-secondary education.

Furthermore, Youth may choose to opt-out of receiving Follow-up services.

Scope and Intensity

- o Must be based on the needs of the individual participant with a minimum contact of
 - Once each month of the first quarter following closure;
 - Once during the first month of the 2nd quarter following closure;
 - o Once during the 3rd quarter following closure; and
 - Once during the first month of the 4th quarter following closure.
- Supportive services are allowed with proper documentation of need prior to the client's first paycheck, following the local policies regarding Supportive Services that are in place.
- Staff must make services for job search, career planning, job retention or workplace counseling if he/she is no longer employed available to participants, as needed.

Documentation

- Follow-up case notes should be maintained in the Virginia Workforce Connection (VaWC) and in the file to document all contacts and efforts made to/with/on behalf of the customer during the twelve-month follow-up period.
- Documentation should verify the complete status of the client, including place of
 employment, wage, hours per week, and information regarding any lapses in
 employment. Virginia Employment Commission (VEC) Unemployment Insurance (UI)
 wage matches may be utilized to verify employment & wage information for follow-up
 and performance purposes.
- If staff have knowledge that an individual has employment that will show on VEC UI
 reports, no further action to verify employment & wage data for that individual is
 required by WIOA Title I case management staff. The VEC UI wage match will occur
 when the state runs those reports & will be processed within VaWC for performance
 requirements.
- Follow -up should assess if additional services are needed. If staff are utilizing wage
 matches through VEC UI wage matches, follow-up services must also be made available
 to customers on an as-needed basis.
- Staff must update follow-up screen in the VaWC quarterly to document that/when follow-up has occurred.
- Staff must document diligent effort to secure/upgrade employment for the client when he/she is unemployed or has received a cut in hours or wages during the twelve months following exit.
- While unemployment insurance (VEC) wage records are the primary source of
 information in the calculation of performance rates, supplemental data is acceptable for
 calculating performance rates when wage data is unavailable (with the exception of
 median earnings measure). Supplemental data must be recorded quarterly after exit in
 VaWC using the Follow Up section. Individuals whose employment may not be verified



by VEC UI matches include, but are not limited to: self-employed, federal employees, Railroad employees, migrant or seasonal farm workers, etc.

- When an exited participant is employed in an occupation covered by unemployment insurance in the quarter in question, staff may focus on providing additional services in follow-up rather than obtaining employment status & wage records, as the VEC wage match will be run by the VCCS and data will be recorded for follow-up and performance measures in this instance. Local VEC staff will provide training for WIOA Title I staff regarding which types of employment are covered under UI records. If there is any uncertainty on the part of the WIOA Title I case manager of whether or not there will be a UI wage match, the Title I case manager has the responsibility of obtaining employment & wage verification as needed.
- In order to ensure the accuracy of customer employment status at the time of closure and during the follow-up periods, one of the following supplemental sources should be used to verify employment:
 - o Employment Verification Form signed by employer;
 - Documentation of phone conversation with employer indicating period of time client was employed, name and title of employer representative who verified information, date and time of conversation and method used to communicate with employer representative. Reasonable efforts to obtain the signed employment verification must be documented in case notes before using telephone documentation;
 - Copy of paycheck stub covering the period required by the applicable measure;
 OR
 - Self-attestation can be used only as a last resort if case manager has documented unsuccessful other attempts (see Adult, Dislocated Worker and Youth Eligibility policy).
 - NOTE: For those self- employed, self-attestation covering the period of time required is permitted.
- Data entry of performance information should occur in VaWC at the time performance verifications are obtained.



Title: Individual Employment Plan/Service Strategy	Related Forms: Yes
Effective Date:	Revised Date:

Purpose:

The purpose of this policy is to provide entities awarded a subcontract or agreement through the Western Virginia Workforce Development Board WIOA TITLE I funds for Title I with the guidelines and requirements for the development and implementation of Individual Employment Plan (IEP) and Individual Service Strategy (ISS) documents.

References:

- Workforce Innovation & Opportunity Act (WIOA)
- Training & Employment Guidance Letters (TEGL) 21-16, 08-15, 03-15, 19-16

Policy:

The individual employment plan (IEP)/Individual Service Strategy (ISS) is an individualized career service plan, under WIOA sec. 134(c)(2)(A)(xii)(II), that is developed jointly by the participant and career planner when determined appropriate by the one-stop center or one-stop partner. The plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve the employment goals.

WIOA enhanced the youth program design through an increased emphasis on individual participant needs by adding components to the objective assessment and individual service strategy. WIOA incorporates career pathways as part of both the objective assessment and development of the ISS. In addition, the ISS should directly link to one or more of the performance indicators.

Procedure:

The IEP is an individual plan based on the information provided by the assessment. It serves as the basis for the entire case management strategy for Adults & Dislocated Workers, and identifies:

- 1. Employment goals (s), including non-traditional employment goals;
- 2. Job readiness, specific strengths, and identified deficiencies;
- 3. Appropriate achievement objectives;
- 4. Appropriate services based on assessment;
- 5. Assessment of individual's financial, social and / or supportive needs; and,
- 6. Sequence and mix of services to be provided.

The IEP will also document the services provided to the individual. If changes in the employment goals and / or services occur, the IEP must be revised.

Any information that describes an individual's medical condition or disability must be maintained



in a separate file consistent with policies and procedures and reference made to the separate file.

Local labor market information must be taken into consideration in the development of the IEP.

It is the WIOA Title I Program Operator's responsibility to establish processes to review and approve all registration paperwork, including the IEP, for completeness, accuracy and internal consistency as well as to ensure that the plan in each participant's file is current at all times.

The WIOA Title I Youth program requires every youth participant to have an ISS. The program calls for customer- focused services based on the needs of the individual participant not on the time constraints or structure of the provider. This includes the creation of career pathways for youth in all Title I youth programs, including a connection to career pathways as part of a youth's individual service strategy (ISS) in the youth formula-funded program. The ISS must directly link to one or more of the performance indicators. WIOA also calls for participants to be intimately involved in the design and implementation of services so the youth voice is represented, and their needs are being met.

The ISS represents an individual plan for each young person that includes:

- 1. Educational goal/s of the participant;
- 2. Employment goal/s of the participant, including when appropriate, non-traditional employment goals;
- 3. Objective assessment of current academic & skill levels, basic & occupational skills, prior work experience, employability, interests & aptitudes, supportive service needs, and developmental needs:
- 4. A "roadmap" to achieve measurable and attainable short & long-term goals;
- 5. Appropriate achievement objectives for the participant;
- 6. Appropriate services, the sequence & mix of the services, and justification for the services to be provided;
- 7. Any referral/s to other services/programs;
- 8. Services needed, but not available; and
- 9. Linkages to one or more performance indicator, that considers career planning & the results of the objective assessment and that prescribes achievement objectives and services for the participant.

The ISS is a distinct plan designed specifically for the participant and is based on the information obtained during the objective assessment. The ISS will serve as the basis for the entire case management service strategy and as a guide for delivery of appropriate services. The ISS will identify and document a youth's progress, activities completed, benchmarks reached, and accomplishments.

Additionally, the ISS shall be:

- Developed in partnership with the participant;
- Used as a tool that can & will change over time, as necessary, to meet the needs of the participant;
- Used as a roadmap to achieve goals;



- Designed to reflect the participant's interests & incorporate career pathway planning;
- A living document, reviewed & updated regularly (at a minimum once every 90 days);
- A reference for goals and credentials to be obtained by the participant;
- A timeline for individual participation, independent of program year or contractor timelines; and
- A record of services, in conjunction with case notes.

Related Forms:

IEP Adult DLW

IEP Youth



BLUE RIDGE REGION

Title: Individual Training Accounts (ITA)	Related Forms: Yes
Effective Date: 1/27/2017	Revised Date: 9/26/2019

Purpose

The purpose of training is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. This policy is intended to define and establish parameters for Individual Training Account (ITA) development and expenditures.

Reference

Workforce Innovation and Opportunity Act (WIOA) Title 1 00-8 Virginia's Training Voucher System under WIA VWL #05-08, Individual Training Accounts for Out-of-School and/or Older Youth

Policy

A WIOA-eligible registrant is enrolled in a training program if the Individual Employment Plan (IEP) supports that the training is necessary to transition the participant into the workforce. The training must support the stated purpose of WIOA and be in accordance with the description of training as contained in the Act. Whenever feasible, training vendors will be requested to allow participants to receive credit for required courses when equivalent courses have been completed and can be documented from other training institutions. Additionally, costs associated with College Level Examination Program (CLEP) Testing will be treated as a training cost if the testing relates to the curriculum of study.

Procedure

Eligibility

All recipients of training funds must be eligible based upon criteria established under the Act. WIOA requires the coordination of training costs with funds available under other grant assistance (Section 134). WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources, including PELL Grants, to pay the costs of their training or require assistance beyond that available under grant assistance from other sources, including PELL Grants but excluding loans, to pay the costs of such training to avoid duplication of payment. Individuals must maintain an active application status for PELL assistance. The exact mix of funds shall be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid, and that necessary supportive services are available so that the training can be completed successfully. The total school budget will be supplied by the vendor based upon a formula used by institutions that determine financial aid. This total school budget is not inclusive of childcare assistance.

Staff should determine and document clearly the need for training for each participant in both the Individual Employment Plan (IEP) as well as in case notes in the system of record, the Virginia Workforce Connection (VaWC).

Occupational Areas of Training



The training provided through ITAs is for the sole purpose of facilitating transition into the workforce. All training will be for occupations identified as in demand in the labor market and determined to be of priority by the Western Virginia Workforce Development Board (WVWDB) in the Local Plan.

Staff may request a waiver for participants that are interested in training outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by the WVWDB Director prior to approving funding for the participant. Waiver documentation must include, at a minimum:

- justification within the participant's IEP identifying occupation interest and/or aptitude;
- barriers to employment and/or training in the target sectors and occupations;
- and local labor market information including LMI data as well as at least 3 different current job openings paying a self-sufficient wage (as defined in our Eligibility policy) for the occupation connected to the training.

These items must be attached to the waiver request form to the WVWDB Director. Waivers may be available for no more than 5% of funds budgeted annually by line item and by program (i.e.: 5% of the Adult ITA budget, etc.).

Training funded specifically for Commercial Driver's License (CDL) may not exceed 25% of the total occupational skills training budget, per program, per year.

Training Selection

Training will be provided for priority occupations only as determined by the Board by an institution or organization certified as meeting the criteria and having completed the procedures outlined in the Eligible Training Provider Certification policy. Participants have choice of any approved provider and approved program that is on the statewide ETPL housed within the system of record, VAWC. Approval for local funding, however, will be based on criteria listed within this policy as well as funding limitations within supportive services that may be required for trainings.

Length of Training

The purpose of training services is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. Training length will vary according to the type of training and the requirements outlined in the vendor agreement. Because entering or returning to the workforce is a priority under WIOA training, training cannot exceed more than 24 calendar months. Training should lead to an industry-recognized certification and employment that earns a sustainable wage. Participants whose IEP includes training lasting more than 24 months must request a waiver from the WVWDB Director PRIOR to beginning the training and expenditure of funds. Participants whose training was planned for less than 24 months but who require additional time to complete the program of study must request a waiver.

Repeat Training

The WVWDB will NOT provide funding for courses/programs previously funded but not successfully completed.



Cost Limitation

The local WVWDB limits training cost to no more than \$3,500 per participant within a twelve-month period, except as approved by the WVWDB Director prior to the expenditure of funds. Funding of training and supportive services combined may not exceed a total of \$6,000 in a 12-month period. All WIOA registrants will be made aware of any excess cost of training not covered by the program for which they will be responsible. Program operators are expected to work closely with participants to determine the individuals' ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the needs of the participant while using WIOA funding in the most efficient manner possible.

Administration

All requests for ITA funding must be supported in the participant's IEP. Contact with the participant is required. All participants are also required to complete performance reviews with their case manager on a quarterly/ semester/module basis in accordance with the timeframes outlined on the IEP. ITA funding is authorized on a semester/quarterly/module basis and requires documentation that the participant has successfully completed previous work. Discontinuation of funding for students who are not performing or demonstrating satisfactory progress toward completion of training goals is allowed. Students are expected to maintain no less than a cumulative 2.0 grade point average for the year in order to continue to receive WIOA funding. Invoices from training providers must be placed in customer files with vouchers to substantiate payments. Vouchers must have all signature lines successfully signed prior to payments being made. Payment are made to training providers on behalf of an individual participant. Payments are not made to participants directly and are not made as reimbursements for expenses paid by participants prior to program enrollment and/or approval from program operator.

Waivers

A waiver to the above maximum specifications may be requested from WVWDB director on a case-by-case basis. Waivers must be submitted and approved by the Director prior to the expenditure of funds. The necessity for waiver must be sufficiently justified and documented for a waiver to be approved. The Executive Director may approve exceptions to the cost limit up to \$8000 maximum limit for the following: computer & information systems training and certification; healthcare training and certification; and manufacturing & processing training and certification. Please note, the eligible training provider who receives the maximum waiver amount of WIOA funds to serve a WIOA participant will need to include certification testing and placement into employment as part of their training cost.

Related Forms:

Waiver Request

Training Policy & Selection

Training Plan

Training Policy & Selection