



**Greater Roanoke Workforce Development Board  
Program Oversight Committee**

May 21, 2025

2:00pm

Virginia Career Works Roanoke Center  
707 S Jefferson Street Roanoke VA 24016

<b>I.</b>	<b>Call to Order</b>	<b>Abby Hamilton</b>
<b>II.</b>	<b>Public Comment</b>	
<b>III.</b>	<b>Consent Agenda</b>	<b>Abby Hamilton</b>
	<ul style="list-style-type: none"><li>• Meeting Minutes 2/12/2025</li><li>• One Stop Center Reports</li><li>• ETPL Applications – Build Smart Institute</li></ul>	
<b>IV.</b>	<b>Old Business</b>	<b>Leah Gibson</b>
	<ul style="list-style-type: none"><li>• Franklin &amp; Covington Center Updates</li></ul>	
<b>V.</b>	<b>New Business</b>	<b>Leah Gibson, et. al</b>
	<ul style="list-style-type: none"><li>• Staff Update – Grants</li><li>• Policy Updates</li><li>• Training Funding Update</li></ul>	
<b>VI.</b>	<b>Program Operations Report</b>	<b>Stephanie Martin</b>
	<ul style="list-style-type: none"><li>• PY24 Programs Report</li></ul>	
<b>VII.</b>	<b>Strategic Plan Actions</b>	
	<ul style="list-style-type: none"><li>• Committee Goals &amp; Strategies</li></ul>	
<b>VIII.</b>	<b>Upcoming Meetings</b>	
	<ul style="list-style-type: none"><li>• Program Oversight Committee Meeting – TBD, new program year</li></ul>	
<b>IX.</b>	<b>Adjournment</b>	



## Greater Roanoke Workforce Development Board

### Program Oversight Committee

February 12, 2025

1:00 PM

<https://us06web.zoom.us/j/82144911677?pwd=UTNiJqfvQbfXi2vzkGALpf9OenHdok.1>

Members	Present
Abby Hamilton, Chair	X
Joe Brinley	X
Joe Cobb	X
Karen Michalski-Karney	X
Maiya Ashby	X
Stephanie Hoer	X
Kimberly Dameron	

GRWDB Staff	Present
Leah Gibson	X
Emma Howard-Woods	X
Stephanie Martin	X
Morgan Romeo	X

### **Call to Order**

Abby Hamilton called the meeting to order at 12:58

### **Public Comment**

There was no public comment

### **Meeting Minutes Approval**

Abby Hamilton asked the group to review the minutes from the last meeting.

**Program Oversight Committee Action:** A motion was made by Karen Michalski-Karney to approve the minutes as presented. Stephanie Hoer seconded the motion. The motion was carried by a vote.

### **Center Reports**

### Roanoke Center

Leah shared that the new Roanoke Center location is almost complete. It has full utilities, and all construction has been completed. The only remaining piece is the lease, which hasn't been signed by the state, and is holding up the VEDA installation. Without this, state employees, including VA Works staff can't move in. Everything that can be done in advance of this is being done, the Resource Room is fully ready, and Roy is already set up in the new facility. We have a tentative grand opening date of March 18<sup>th</sup>.

### Covington Center

Leah shared that that the Covington Center was up for sale and had a January 31<sup>st</sup>, 2025 bid deadline. Morgan has asked for an update on the sale, but has not received any information yet. Until otherwise noted, it will continue operations as normal.

### Franklin Center

Leah shared that the Franklin Center has been under evaluation from some time both from the Franklin County Government as well as key center partners, including the GRWDB. Over time, the vision and goals for the center have shifted, leading to the question of whether or not to continue to operate the Franklin Center as a Virginia Career Works affiliate center.

Morgan shared that in the move toward fiscal stability, keeping the Franklin Center as a Virginia Career Works affiliate Center does not make sense. The Franklin Center currently doesn't meet all the criteria for the certification, so the team has decided to remove the affiliation. This will not remove services from Franklin County, and instead services will be offered at mobile access points, of which the Franklin Center can be one. Morgan has asked the Dept. of Labor for guidelines and best practices for mobile access points, to ensure that the Franklin Center, and any other mobile access points potentially including the Covington Center, are able to successfully provide services.

Stephanie Hoer commented that transitioning towards a mobile access point model is a good solution for such a complex issue.

### New Business

#### ETPL Applications

Leah shared the new ETPL application that was received from QS Academy, a Texas based online learning training provider offering healthcare and IT training solutions. Their application meets all requirements, and have provided all verifications needed.

**Program Oversight Committee Action:** A motion was made by Karen to take the QA Academy Application to the Board for approval. Maiya Ashby seconded the motion. The motion was carried by a vote.

## Eligibility Policy

Leah shared that the Eligibility Policy was discussed at the last Board meeting, and that there was discussion about the criteria for youth in need of additional assistance being potentially discriminatory. In light of recent executive orders, this criteria has been removed from the policy to ensure appropriate guidelines are being followed. With this change, the Eligibility Policy is back at the Program Oversight Committee for review to go back to the Board. The other existing changes include the change to the state policy reference, and additional language about suitability for funding.

The group shared their agreement with the decision to remove the youth eligibility criteria, and wants to ensure all policies are in line with federal guidance. Leah also shared that the removal of the specific criteria shouldn't have a measurable impact on qualifying youth for the program, as they would likely meet another one of the criteria needed. Leah also shared that the GRWDB team is reviewing all policies and procedures to make sure guidance is being followed, and the Dept. of Labor will be monitoring the GRWDB this spring, so anything missed will be addressed as needed.

**Program Oversight Committee Action:** A motion was made by Karen to approve the Eligibility Policy changes as presented. Stephanie Hoer seconded the motion. The motion was carried by a vote.

## Branding Update

Leah shared that there has been a decision at the state level to rebrand all Virginia Career Works Centers to Virginia Works Centers. This decision is very important as signage for the new Roanoke Center still needs to be purchased. There has been an ask of the State Board to allocate funding for this rebrand. This rebrand is for American Job Centers only, and will not impact workforce board branding.

Morgan also shared that marketing research showed little public awareness of the current brand (Virginia Career Works), and that there have been at least 4 rebrands in the last 10 years.

Maiya asked when the new branding will be sent out. Morgan shared that if the funding is approved by the State Board on March 28<sup>th</sup>, and VA Works takes immediate action in April, then there will be about 3 months to spend the rebrand funding. Morgan has also made the ask to bring in a marketing consultant to assist with the rebrand.

Abby asked if the logo was changing as well. Morgan shared that yes, the logo is changing too. The state will likely provide a style guide complete with logos, fonts, colors, and other requirements for branding.

Abby asked if there will be a gap between the new branding decision and funding and the opening of the new Roanoke Center. Leah shared that yes, there will be a gap, and that the team is exploring ways to provide temporary signage to bridge the gap.

## Outreach Plan

Emma shared that the GRWDB team is starting to work on a regional outreach plan, that will include core partners, and will allow for shared outreach efforts within the workforce system. As the outreach plan is being developed, a small team of representatives from core partners will be selected to work with Emma on developing the plan, allowing for replicable outreach strategies to be implemented across organizations.

## Grants Update

Morgan shared an overview of current discretionary grants held by the GRWDB. The OnRamp Grant, in partnership with TAP and United Way, provides whole family supports to address barriers for families needing services. The DSS Grant, in partnership with DSS, TAP, and Goodwill, connects individuals with dependents to employment services to help address the benefits cliff while reducing the need for public assistance.

Morgan also shared an update on new grants the GRWDB is considering applying for. The GRWDB currently has a planning grant for Americorp to provide support in preparing for the implementation grant application. However, the implementation grant came out sooner than expected, and at the time when the federal funding freeze was taking place. This meant that the GRWDB was unable to secure the non-federal match funds needed for the application. The decision has been made with Serve Virginia that the GRWDB wait for the next round of implementation grants, providing more time to secure the match funds. If awarded, this grant would provide Americorp members in rural access points to provide skills building services to job seekers in rural Virginia.

Morgan also shared that the GRWDB team is considering applying for the Community Development Block Grant as well as the new Inspire grant. Inspire would be in collaboration with the Alleghany Highlands Community Service Board, who would be able to provide case management supportive services to participants in or seeking recovery from Substance Use Disorders.

Another grant up for consideration is the Rural Business Development Grant, which would provide additional Incumbent Worker Training funds for businesses in most of the GRWDB localities, except for the Cities of Salem and Roanoke. Morgan shared that Toni McLawhorn, the GRWDB Business and Development Manager, has done an excellent job of marketing this service to the business community, and is in need of additional funds.

The READY Nonprofit Grant is another grant under the Appalachian Regional Commission, providing capacity building for nonprofits in the Appalachian region. This would provide Morgan and Leah with training in the fields of grant writing, grant management, and human capital.

Lastly, the GRWDB is seeking locality funding from all localities served. This funding will support career pathways development, and is asking \$.25 per capita from all localities.

Morgan also provided an update on the current WIOA Adult funding, which is running low earlier than anticipated. Due to the close partnership of Carilion and their Grow Your Own program, the GRWDB Bootcamps, and a general increase in referrals, there is a very limited amount of funding to support the adult program through the end of the fiscal year. The team is evaluating other funding opportunities to supplement the remaining funds, but it is likely that the team will need to limit enrollments and/or adult spending through the end of June. Morgan shared that this will be discussed at the upcoming Board meeting, and that by then she hopes there is a better idea of funding that will actually be available.

Leah added that this restriction only applies to funding things like training and supportive services, but that participants will still be eligible for non-funded services like job search.

Maiya shared that this should be a full discussion at the board level, but that she is in support of finding a creative solution to limit funding spent through June. Abby agreed, and asked how to determine the best way to spend the remaining funds. Morgan agreed that a financial management plan is needed, but that the team is open to discussing multiple options for determining funding obligations.

Stephanie Hoer asked if the remaining funds include the funds needed to carry forward. Morgan shared that the remaining dollars are what is left in the adult budget through June 2025, and doesn't include anything else like personnel or fringe costs. Morgan also shared that Congress already passed the budget, but that there is a chance that funds could be rescinded since the GRWDB fiscal year doesn't align with the Federal fiscal year.

Karen suggested that Morgan and Leah develop a few different options for ways to limit spending or restrict enrollments to bring to the upcoming Board meeting. Maiya agreed and added that the Program Oversight Committee could provide feedback on the options to bring to the Board as well. Morgan and Leah agreed to create some options.

Abby asked if the GRWDB is applying for YouthBuild. Morgan shared that the RFA has not come up yet.

### **Programs Report**

Stephanie Martin shared the Programs Report. Data included is through December 2024. The committee had already discussed the adult program. Stephanie shared that the DLW numbers are low, as it is hard to meet eligibility criteria, but that every participant is being screened for this program. She also shared that the team is in communication with Goodyear due to the layoffs in Danville.

Stephanie also shared that the youth program has low enrollment, but shared hope for upcoming enrollments as the team continues to create bootcamps, which are an effective way of getting

youth enrolled in the WIOA program. There are several bootcamps currently being developed, including a Craig/Botetourt Infrastructure camp in early June, a Healthcare camp in April or May, and several Roanoke City camps as a part of the Summer Youth Initiative that the GRWDB has taken over this year. More information on these camps will come soon, as dates and logistics are still being worked on.

Stephanie also shared excitement for the Community Development Block Grant, as it would provide a capacity building for the youth program, and help build strategic programming and resource mapping in Roanoke City, that would be replicable in other localities. Leah shared gratitude towards Stephanie, who has done an excellent job at adjusting to the Program Manager position since Elizabeth Mann's resignation.

Abby asked about Career Quest. Emma shared that we are generally happy with the business turnout, and that it has been difficult to recruit businesses in the past. Morgan shared that the schools did not provide as many students as estimated. Several schools, including Montgomery, brought significantly less, as low as 8%, of estimated students. Some schools, like Botetourt County and Salem, set up the trip as mandatory, and require parents to "opt out" rather than give permission, leading to increased students. Other schools reported that advanced placement teachers make it hard for students to miss class, leading to reduced participation. Craig County High School did not come at all, and didn't communicate with the team at all until after the fact.

Maiya shared that she will be attending a roundtable with Ben Cline next week, and offered to pass along any information. Morgan agreed to follow up with her via email.

### **Upcoming Meetings**

Program Oversight Committee Meeting- May 21, 2025, 2:00 PM, In-person, Location TBD

### **Adjournment**

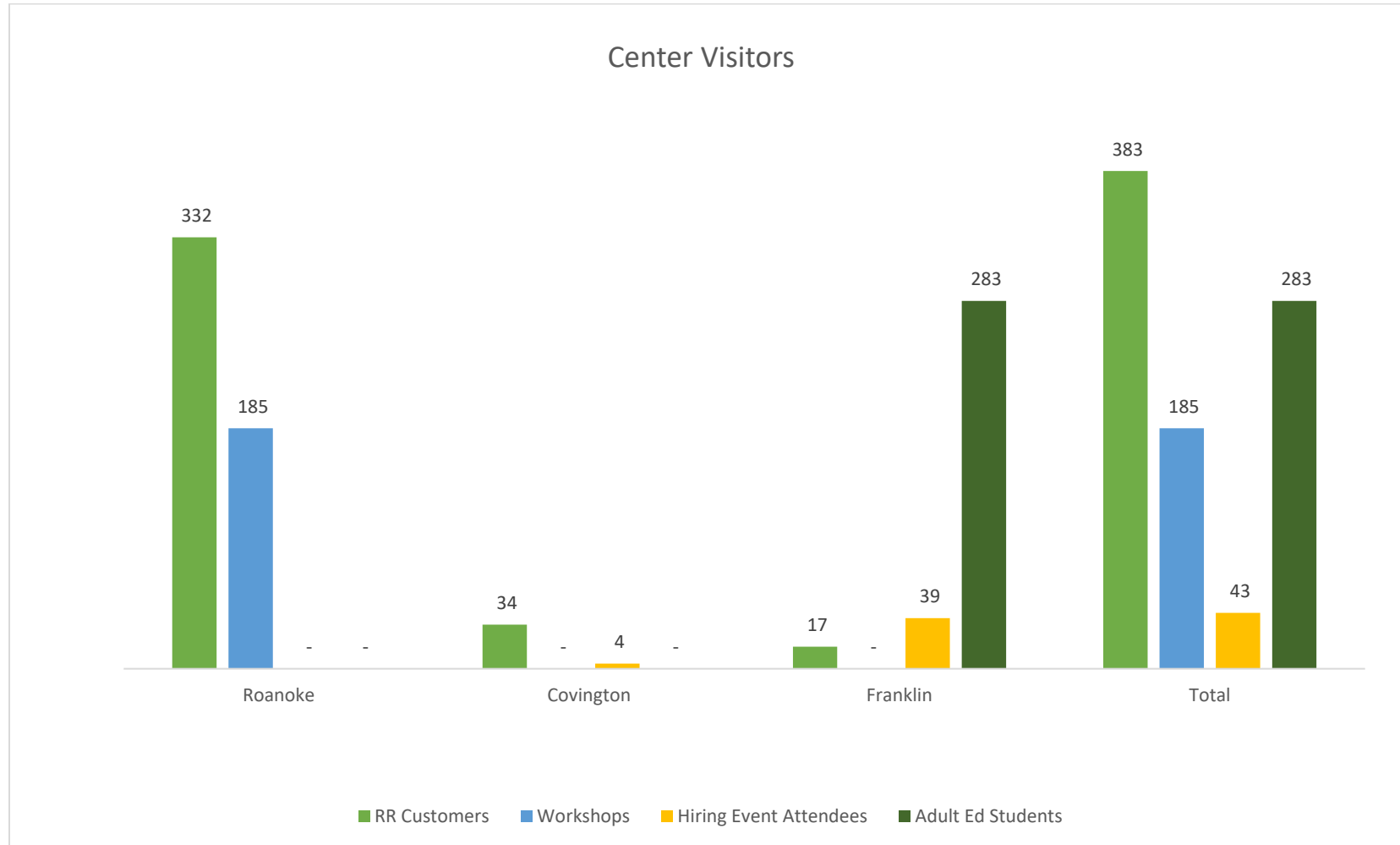
Abby Hamilton adjourned the meeting at 2:04

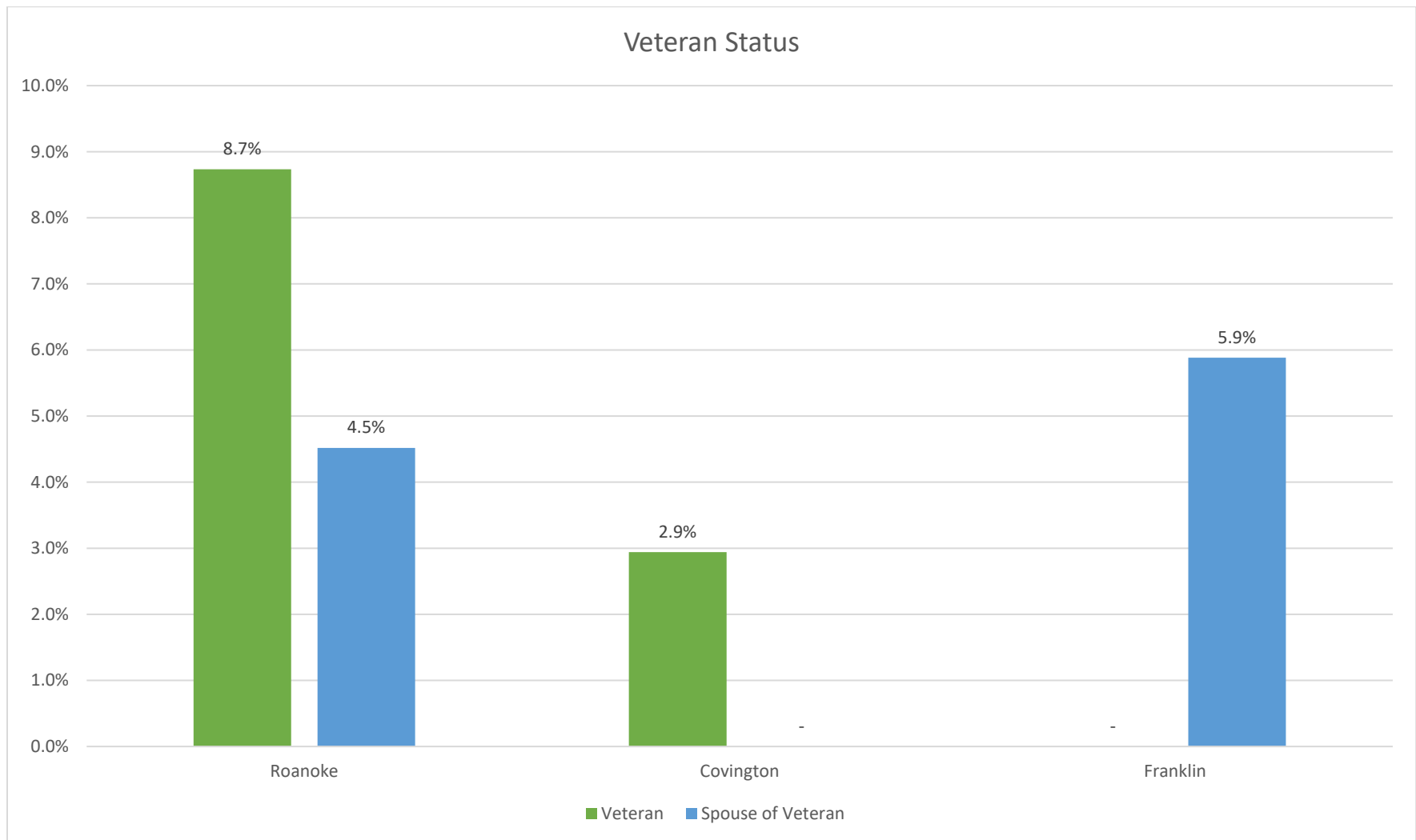
Month	Intake	First Visit	First Visit (%)	Avg # Visits/Customer	Unique Visitors	Veterans	Workshops (Job Seekers Attending)	Adult Ed Students	Hiring Events (Job Seekers Attended)	Hiring Events (Employers Attended)	Hiring Events (Total Events)	Total Visitors	Customer Satisfaction Surveys Completed	Percentage CSS Submitted	8:30-10:00	10:01-12:00	12:01-2:00	2:01-4:00
Jul-24	650	192	29.5%	1.4	453	56	0	0	5	4	4	655	3	0.5%	0	0	0	0
Aug-24	0	0	0.0%	0	0	0	0	0	0	0	0	0	0	0.0%	0	0	0	0
Sep-24	0	0	0.0%	0	0	0	14	0	161	15	1	175	0	0.0%	0	0	0	0
Oct-24	0	0	0.0%	0	0	0	0	0	249	60	1	249	1	0.2%	0	0	0	0
Nov-24	0	0	0.0%	0	0	0	0	0	44	3	3	44	2	0.3%	0	0	0	0
Dec-24	0	0	0.0%	0	0	0	0	0	5	1	1	5	0	0.0%	0	0	0	0
Jan-25	0	0	0.0%	0	0	0	14	0	60	5	5	74	2	0.3%	0	0	0	0
Feb-25	0	0	0.0%	0	0	0	0	0	32	6	6	32	0	0.0%	0	0	0	0
Mar-25	161	49	30.4%	1.5	111	8	0	0	50	2	2	211	0	0.0%	21	54	41	45
Apr-25	332	102	30.7%	1.5	218	29	185	0	0	0	0	517	0	0.0%	50	139	78	65
May-25																		
Jun-25																		
TOTALS	1143	343	30.0%	1.5	782	93	213	0	606	96	23	1962	8	0.7%	71	193	119	110

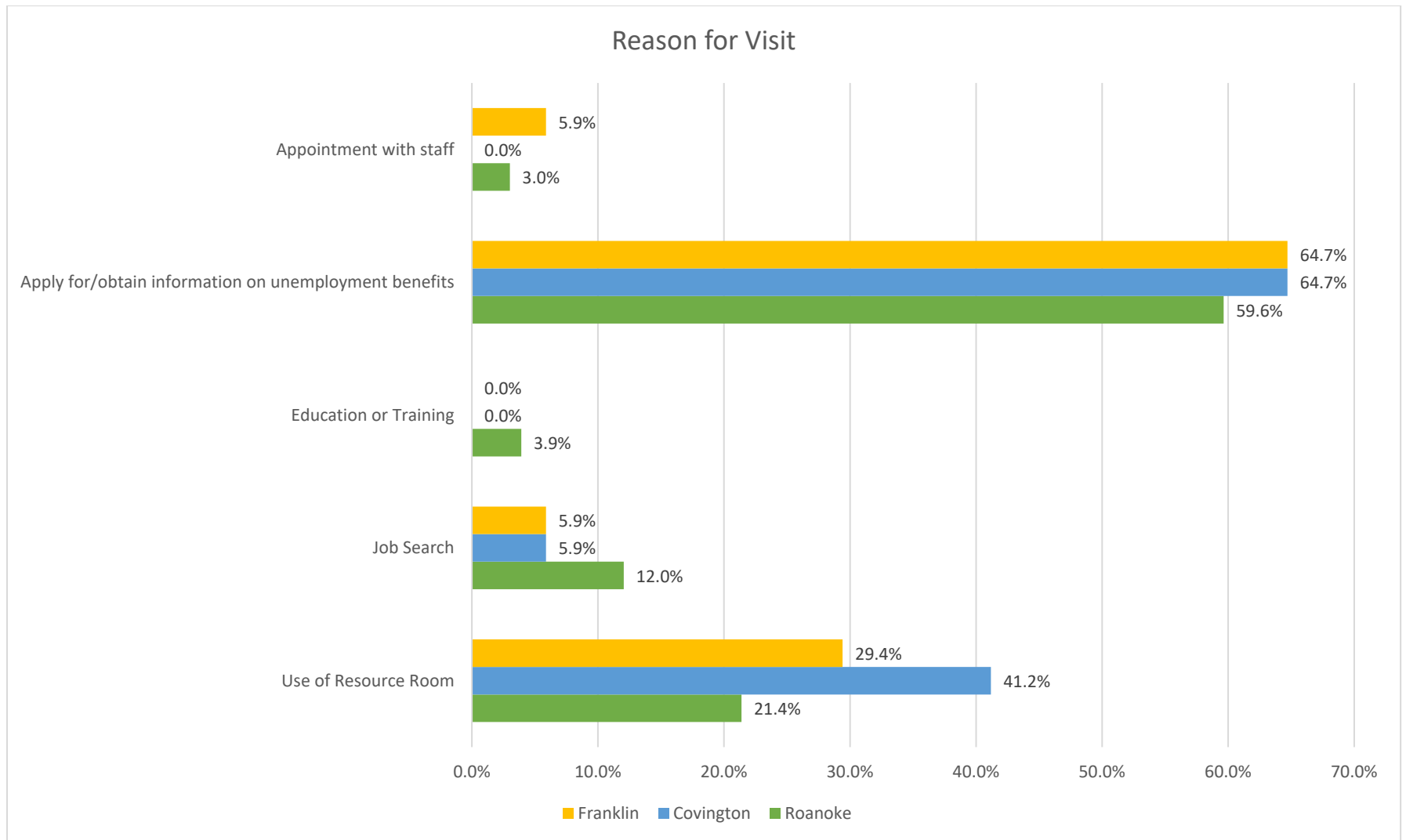


**Virginia Career Works Blue Ridge Intake Data Summary  
April 2025**

**Please note: Results below are based on the number of responses to each question.**







**May 2025 New ETPL Applications**

<b>Provider</b>	<b>Provider Requirements</b>
Build Smart Institute	x
<b>Programs</b>	<b>Program Requirements</b>
Heavy Equipment Operator Level 1	x
Heavy Equipment Operator Level 2	x

**Title:** Center Updates

**Background:** The Covington Center has been in the process with the state (owner of the building) to put the facility up for bids within the state system. The City of Covington had expressed interest in submitting a proposal to buy this building. The Franklin Center has been under review both by the GRWDB as well as Franklin County to determine the purpose of the facility, the services provided, and the partners housed within.

**Considerations:** The City of Covington had contracted to have a third party entity evaluate the Covington Center building to determine costs to have the facility updated and get up to code. Meanwhile, as the process has taken so long, the state, as the property owner, has learned that another state entity has expressed interest in the facility. Our understanding now is that the state will entertain the new interested party and their proposal while the City determines their next steps.

GRWDB staff have met with Franklin County and Franklin Center leadership as well as other workforce partners that serve clients in Franklin County. Conversations are in progress to determine the focus of the Center itself at the County level. However, the GRWDB plans to still have the Franklin Center as an “outpost location” and are working to determine the specifics of what that may look like moving forward, it will include partners being present & providing workforce services in the Resource Room. The GRWDB will be overseeing the Resource Room, as they have in the past, but the Franklin Center will no longer be certified as an Affiliate Center, as we are unsure what the future of the facility as a whole will look like.

**Title:** Grants Update

**Background:** The GRWDB has several discretionary grants that have been awarded to the organization for administration, oversight, and/or implementation. The WIOA Title I federal funding through the Adult, Dislocated Worker, and Youth programs is a steady funding stream that is appropriated by the US Congress, administered and delivered to the states by the US Department of Labor Employment and Training Administration, and then subsequently to the local areas. Other funding is received from state, localities, and other discretionary grant resources.

**Considerations:** The following gives a brief update on some of the grants that have been pursued by GRWDB staff or are currently being received:

**Current Budget (FY2025)**

- **AmeriCorps Planning Grant:** This funding was received in the amount of \$75,000 to assist the region in applying for implementation funding to staff AmeriCorps volunteers in the region for outreach. The federal administration eliminated the AmeriCorps grant awarded to the GRWDB and staff were forced to close out the grant as of April 30, 2025.
- **OnRamp Funds:** This annual funding in partnership with Total Action for Progress (TAP) through the United Way helps to fund the One Stop Manager, in their role managing partnerships and referrals by the public workforce system. It also provides additional supportive services for job seekers to access to remove barriers to employment and training/professional development funds for public workforce system staff. GRWDB staff were notified by United Way of Virginia's Blue Ridge that funding had been approved in the same amount for FY2026.
- **INSPIRE:** This funding received through the Appalachian Regional Commission (ARC) expired 3/31/2025 and the GRWDB closed out the grant with positive success.
- **JobsPlus:** This partnership between the GRWDB and the Roanoke Redevelopment Housing Authority (RRHA) as slated to end 6/30/25 but the GRWDB received word that the grant was extended for an additional year. GRWDB staff have requested a meeting with RRHA staff but have not heard back yet on a date.
- **Summer Youth Employment Program:** The City of Roanoke has traditionally had a program focused on youth and young adults gaining work experience during the summer months. This program was run by Goodwill for the past 5 years, in partnership with the GRWDB, but the City of Roanoke and GRWDB were notified in early spring 2025 that Goodwill was not interested in continuing the project. The City of Roanoke modified the contract and provided the funds to the GRWDB to operate for Summer 2006. The funding amount is \$31,770.

- Summer Jobs Connect: Along with the summer employment program, the City of Roanoke also received \$20,000 to provide financial literacy and budget support to youth going through the summer program. This is in addition to the grant above for Summer 2025.

Prospects:

- Community Foundation of Western Virginia – Capacity Building Grant: The GRWDB staff applied for a capacity building grant in April 2025 through the Community Foundation of Western Virginia. Staff were notified on May 15 that they were not chosen as a recipient of the grant as it was extremely competitive.
- City of Roanoke CDBG Funding (HUD): GRWDB applied for funding to help engage with youth in the City of Roanoke and conduct outreach and marketing of the GRWDB and job services. The City has been waiting for the US Housing and Urban Development Department to allocate the funding, which will then be allocated out to projects based on community input. The funding would begin on July 1<sup>st</sup> if awarded.
- Statewide Set-Aside Grants: The GRWDB applied for two statewide set-aside grants to begin July 1<sup>st</sup> that would help provide additional training dollars. The first would help to sustain the partnership with Carilion Clinic funding their CCMA, Pharmacy Technician and EMT programs, as well as Friendship and their CNA program. The goal would be to share the best practices of these two employers to try to replicate the process with other employers, as they lead to guaranteed jobs. The second grant is in partnership with the Build Smart Institute to help them launch their Heavy Equipment Operator program in partnership with several employers in the region.

**Action Recommended:** Information only.

**Title:** Policy Review

**Background:** The GRWDB has the responsibility of reviewing and approving all program policies for the administration of the WIOA Title I programs. GRWDB staff review these policies on a regular basis to ensure that no updates need to be made from revised federal or state guidance or no updates need to be made based on customer needs.

**Considerations:** The GRWDB staff are undertaking a full review of the policies and procedures that are currently in place for WIOA Title I program operations to ensure the organization follows federal and state guidance. This review is also taking place to ensure that operations are in line with funding amounts and provide the best customer service to the most job seekers and businesses possible. On the heels of the previous two years that have seen a decrease in federal WIOA Title I funding allocations for the region, the GRWDB staff are anticipating another large decrease which will affect operations greatly.

There are several policies included in the packet that are being revised with the following being the most common themes among the revisions:

- Updating federal and state policy references to incorporate newly released changes.
- Revising maximum per customer amounts from \$8,000 to \$5,000 to accommodate reductions in federal allocations.
- Adding language to **only** pay for training that falls within the Manufacturing, Healthcare, or Infrastructure industries to streamline funding.
- Aligning policies with customer needs and other best practices around the Commonwealth and the nation.

The following policies are being presented to the Executive Committee for their review and approval. Full changes can be found in each policy that is being presented in their red-lined version, but summaries can be found below:

- **LEP Policy:** Updating this policy as required on an annual basis to reflect current demographics of the region's population and detail the methods for which the GRWDB will provide translation, interpretation, and other services to individuals who are ESL.
- **Adult DLW Incentives Policy:** Grammatical changes were made to the policy along with aligning the incentive amounts with activities that are in need for customers in the region.
- **ITA Policy:** Grammatical changes were made to the policy along with several changes, including the removal of the cap on waiver requests from the Executive Director,



restricting training funding for only those industries identified in the Local Plan as high demand, and revised the maximum amount for an ITA each program year from \$5,000 to \$3,500 based on the availability of other funding for training (FastForward, G3, etc.)

- **IWT Policy:** Grammatical changes were made to the policy along with reducing the amount per employee from \$3,500 to \$2,000 and reducing the total contract amount from \$8,000 to \$5,000. This should allow for more employers to be served through this activity in the next program year.
- **OJT Policy:** Grammatical changes were made to the policy along with several changes, including the removal of the cap on waiver requests from the Executive Director, restricting training funding for only those industries identified in the Local Plan as high demand, and revised the maximum amount for an OJT each program year from \$8,000 to \$5,000.
- **Supportive Services Policy:** Grammatical changes were made to the policy along with several changes, including adding a maximum amount of \$2,000 per job seeker per program year for supportive services, which counts against the \$5,000 per participant maximum per program year, added the provision of transportation assistance through Uber or Lyft and/or RideShare contracts, removed the provision of a waiver.
- **WEX Policy:** Grammatical changes were made to the policy along with provisions being added to accommodate boot camp models for work experience opportunities.
- **Youth Incentives Policy:** Grammatical changes were made to the policy along with aligning the incentive amounts with activities that are in need for customers in the region. Provisions were also added to accommodate boot camp models for work experience opportunities.

**Action Recommended:** Staff recommends that the Executive Committee approve all policies as presented.



**LOCAL WORKFORCE DEVELOPMENT AREA (LWDA) 3  
GREATER ROANOKE WORKFORCE DEVELOPMENT BOARD**

**LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

*Revised May 2025*

## **Introduction**

The Greater Roanoke Workforce Development Board (GRWDB) has developed this Limited English Proficiency (LEP) Plan to address the responsibilities as a recipient of federal funding as it relates to the needs of individuals with limited English language skills.

The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1965, 42 U.S.C. § 2000d, et seq. and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency), which indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. The Greater Roanoke region has developed and published a Limited English Proficiency (LEP) Policy for the region for its respective staff clarifying their obligation to ensure that such discrimination does not take place and that LEP individuals receive equal access to services, programs, and activities.

## **Purpose**

The GRWDB has developed this LEP Plan to help identify reasonable steps for providing language assistance to LEP persons who wish to access services, programs, and activities. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This LEP plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

To prepare for this plan, the four-factor LEP analysis was used to determine the languages in the area that would require vital documents to be translated and be readily available upon request. The following factors to be considered are:

1. The number or proportion of LEP persons in LWDA 3 who may be served by the GRWDB.
2. The frequency with which LEP persons come in contact or access services in LWDA 3.
3. The nature and importance of services provided to the LEP population.
4. The interpretation services available and the overall cost to provide these services to assist LEP populations.

A summary of the results of the four-factor analysis is found below.

#### **Four-factor Analysis**

##### ***The number or proportion of LEP persons in LWDA 3 who may be served by the GRWDB.***

The most recent U.S. Census Report was reviewed, and it was determined that of the 334,490 persons residing in the region, 3.6% of the population speak a language other than English. The frequency with which LEP persons access GRWDB services is minimal.

##### ***The frequency with which LEP persons come in contact or access services in LWDA 3.***

The frequency with which office staff have, or could have, contact with LEP persons was also reviewed. This includes documenting phone inquiries or office visits. To date, the region has had requests for interpreters, but no requests for documents to be translated into other languages. Therefore, the GRWDB will continue to monitor the traffic at the Virginia Career Works Centers (American Job Centers) and other outpost locations to ensure that the LEP plan and policy continue to correlate with the number of LEP individuals and constituents served.

##### ***The nature and importance of services provided to the LEP population.***

There is not a large geographic concentration of any specific branch of LEP individuals in the region, as the majority of the population (94.37%) speaks only English. As a result, there are social service, human service, professional, and leadership organizations within the Greater Roanoke region that focus on

outreach to LEP populations. These organizations include Commonwealth Catholic Charities, Roanoke Refugee Partnership, faith-based organizations, and local Departments of Social Services. GRWDB staff and partners of the workforce system are most likely to encounter LEP individuals through office visits.

***The interpretation services available and the overall cost to provide these services to assist LEP populations.***

Available resources that could be used for providing LEP assistance were reviewed. Currently, staff are utilizing Propio for translation services, which is provided by the Virginia Department of Workforce Development and Advancement (Virginia Works). Other language translation, if needed, would be provided through a telephone/internet interpreter in which the GRWDB would pay a fee. The Language Access Coordinator for the Commonwealth of Virginia, employed by Virginia Works, will meet with the GRWDB staff to evaluate and update the LEP plan and policy on a regular basis. This may include the allocation of funds in order to comply with demand from LEP customers or assisting the GRWDB with connecting with resources that are available to provide alternate services so that the demand is adequately met.

**Language Assistance Methods**

The GRWDB will use a combination of interpretation and translation language assistance to provide meaningful access for LEP persons.

**A. Oral Language Services**

- a. **Interpretation** – Listening to something in one language and orally converting it into another language. At no cost to the LEP individual (or family member), interpreter services will be provided to all LEP individuals applying for, participating in, or receiving services and/or benefits. The interpreter services will be provided in an efficient and timely manner as compared to non-LEP participants receiving services.
- b. **Using Bilingual Employees** – Employees who are fluent in another language may provide interpretation language services, when possible. Care will be taken that the person is not only bilingual but

can interpret and/or translate the language in the terms specific to the program. For staff to be used, they must complete a certification process of the languages to be interpreted or translated.

- c. **Using Telephone Line Interpreters** – Telephone line interpreters allow for quick responsive services for a wide number of languages. GRWDB staff and staff at the Virginia Career Works Centers (American Job Centers) will utilize Propio to provide telephone and in person interpreting services. Staff have been trained on the process for securing and providing telephone and in person interpreting services, as needed.
- d. **Using Family Members or Friends of the LEP Person** – The GRWDB and the partners in the Virginia Career Works (American Job Centers) do not rely on the use of the LEP person’s family members, friends, or other informal interpreters to provide language assistance for important program information. However, where LEP persons so desire, they will be permitted to use, at their own expense, an interpreter of their choosing (including family members, friends, or other informal interpreters) in place of, or as a supplement to, the GRWDB’s free language services. A decision to use a family member, friend, or other interpreter will be documented in the case file when possible. Extra caution should be taken if the LEP person chooses to use a minor. Staff must be mindful of the content of the materials and documents being discussed with the LEP individuals as there is an obligation to ensure that meaningful access is being provided.
- e. **Timeliness of Services** – The GRWDB will strive to provide services to LEP customers during the visit or initial contact. Language services should be provided at a time and place that does not cause a denial, delay, or imposition of an undue burden in the receipt of important rights, benefits, or services to the LEP person.

## **B. Written Language Services**

- a. **Translation** – Translation is the replacement of written text from one language into the equivalent written text in another language.

- b. **Determining Which Documents Should be Translated** – In an effort to provide meaningful access to LEP persons, the GRWDB has identified *vital documents* used for services with the assistance of state staff. The following is considered in identifying what documents are “vital”:
  - i. The importance of the program, information, encounter, or service provided.
  - ii. The consequence to the LEP person if the information in question is not provided accurately or in a timely manner.
- c. **Determining the Languages that Documents Should Be Translated Into** – The GRWDB has determined, based on standards used in other industries, that vital documents would be translated into Spanish, although not required based on the population served data. The GRWDB will provide other documents as requested on a case-by-case basis.
- d. **Translate Competency** – As with interpreters, translators should be competent in the skill of translating. Therefore, many of the same considerations apply. However, a person who is a competent interpreter may or may not be a competent translator.
  - i. **Using Bilingual Employees** – The GRWDB will ensure that any employees identified to be used are fluent in another language and have the competencies to provide translation services. Care will be taken that the person is not only bilingual but can interpret and/or translate the language and do so in terms specific to the program. For staff to be used, they must complete a certification process (determined by the GRWDB) of the languages to be translated.
  - ii. **Using Volunteers** – The GRWDB will ensure that any volunteers used from other state agencies, higher education, and/or other local organizations are competent in the skill of translating, trained in the information or services of the program, and knowledgeable about applicable confidentiality and impartiality rules.

- iii. **Using a Certified Translation Services** – The GRWDB will utilize Propio to translate vital documents for languages other than Spanish.

### **Notice to LEP Persons**

The GRWDB will promote the awareness of language services to include:

1. Distributing posters, brochures, and pamphlets regarding programs and services within appropriate local LEP communities.
2. Including the Equal Opportunity tagline in communication to the public such as brochures, booklets, and electronic communications (including the Babel notice/statements).
3. Collaborating with community-based organizations and other stakeholders to inform LEP persons of programs and activities (outreach).
4. Airing notices on language-specific radio and television stations, when available.
5. Utilizing social media to notify of available translation services.
6. Conducting presentations at schools and faith-based organizations.
7. Ensuring website information can be translated into Spanish, at a minimum.

Within local facilities, notices include:

1. Using “I Speak” cards or other language identification measures.
2. Posting signs in selected languages in intake areas and other entry points.
3. Using telephone voice menus in appropriate languages.
4. Recruiting to fill open vacancies using specific language skills.

### **Monitoring and Evaluation**

The GRWDB staff will review this LEP plan annually to determine if changes are needed and whether staff training or development is needed. This will be accomplished by:

1. Reviewing the current LEP population in the service area.
2. Documenting LEP person contacts experienced annually.



3. Reviewing the needs of LEP persons and whether they have been addressed.
4. Determining whether local language assistance programs have been effective and sufficient to meet the need.
5. Determining whether the region's financial resources are sufficient to fund language assistance resources when needed.
6. Determining whether the region fully complies with the goals of this LEP plan.

Periodic monitoring will be conducted by the state-level Equal Opportunity Officer/Language Access Coordinator to ensure that the procedures in this plan are being adhered to and the services are readily available as required.

### **Dissemination of the Plan**

GRWDB staff will be provided with a copy of the LEP plan and provided training and technical assistance at least once per year. The plan will also be included as part of any new employee's orientation and training. Signs will be posted at GRWDB offices and Virginia Career Works Centers (American Job Centers) notifying LEP persons of the LEP plan and how to access language services. The LEP plan will also be available on the GRWDB's website.

### **Dissemination**

- U.S. Census American Community Survey, by using the American Fact Finder (<https://data.census.gov/cedsci>)
- Weldon Cooper Center (<https://demographics.coopercenter.org>)
- Virginia Department of Education (<https://www.doe.virginia.gov/instruction/esl/resources/el-students-in-va.pdf>)



BLUE RIDGE REGION

<b>Title:</b> Adult, Dislocated Worker & Youth Eligibility Policy	<b>Related Forms:</b> Yes
<b>Effective Date:</b> 1/27/2017	<b>Revised Date:</b> <del>2/2025</del> <del>2/2025</del> 5/11/2023

### Purpose

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

### References

- ~~VWL 15-02 Change 2 Eligibility Guidelines~~
- ~~VWL 15-02 Change 2 Attachment A: WIOA Adult Eligibility~~
- ~~VWL 15-02 Change 2 Attachment B: WIOA Dislocated Worker~~
- ~~VWL 15-02 Change 2 Attachment C: WIOA Youth Eligibility~~
- ~~VWL 15-02 Change 2 Attachment D: Verification and Documentation for WIOA Eligibility~~
- ~~VWL 15-02 Change 2 Attachment E: Selective Service Requirements~~
- ~~VWL 15-02 Change 2 Attachment F: Family Size/Family Income~~
- ~~VWL 15-02 Change 2 Attachment G: Self-Certification and Telephone/Document Inspection Verification Requirements~~
- ~~VWL 15-02 Change 2 Attachment H: WIOA Definitions for Title I Eligibility~~
- ~~VWL 15-02 Change 2 Attachment I: WIOA Title I Adult Program Eligibility Checklist~~
- ~~VWL 15-02 Change 2 Attachment J: WIOA Title I Dislocated Worker Program Eligibility Checklist~~
- ~~VWL 15-02 Change 2 Attachment K: WIOA Title I In-School Youth Program Eligibility Checklist~~
- ~~VWL 15-02 Change 2 Attachment L: WIOA Title I Out of School Youth Program Eligibility Checklist~~
- VWL 24-03 WIOA Title I Eligibility Guidance
- VWL 19-04 Change 2 Definitions Related to Dislocated Worker Eligibility
- WIOA Sections 170 and 129
- VWL 20-07 Change 1 VaWC and Electronic Case Files
- VWL 20-07 Attachment A WIOA Title I VaWC Document Naming Conventions

### Policy

It is the policy of the Greater Roanoke Workforce Development Board (GRWDB) to follow all federal guidelines and state guidance in determining eligibility for participants in and recipients of WIOA programs. The GRWDB and its' Service Providers will use their guidance to ensure accurate eligibility determinations are made. It is the current policy of the GRWDB 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, policy will be updated to provide guidance for this provision.

**Formatted:** Font: (Default) Arial, 11 pt

**Formatted:** Font: Font color: Dark Gray, Expanded by 0.4 pt

**Formatted:** Normal, Indent: Hanging: 0.25", Right: 0", Space Before: Auto, After: Auto, Line spacing: single, Pattern: Clear (White), Tab stops: Not at 0.58" + 0.58"



BLUE RIDGE REGION

## Procedure

### 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/lisil/>.

### 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.

The local area follows state guidance regarding definitions of what constitutes Unlikely to Return. This includes an applicant who has been furloughed or temporarily laid off for a minimum of 12 weeks with no return date provided by the employer.

### Suitability

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, as WIOA is not an entitlement program. 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:

- 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.

Furthermore, although an individual may be suitable for WIOA Title I program enrollment, they may not be determined in need of and suitable for intensive services, such as training funding. WIOA Title I is not a financial aid program for training providers or employers. Suitability for funding is determined through one on one assistance and working with staff. Staff evaluation should include evaluation of test results, interviews, inventory of individual's field of interest, skills assessments, career exploration, available labor market information, previous employment and wage history, legal restrictions related to the chosen career path, supportive service needs, and more, as applicable.



#### BLUE RIDGE REGION

##### 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
- 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
- Has experienced/is experiencing effects of substance abuse either by themselves, family members related by blood or marriage, guardians, or other immediate family members such as those connected by birth, adoption, civil partnership, or cohabitation such as grandparents, great-grandparents, grandchildren, great-grandchildren, aunts, uncles, siblings-in-law, half-siblings, cousins, adopted children, step-parents, step-children and cohabitating partners.
- Expectant fathers
- ~~Youth that have been historically underserved and marginalized, to include Black, Latino, and Indigenous persons, Asian Americans and Pacific Islanders and other persons of color, members of religious minorities, lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons~~

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 Career Coach 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.

##### Co-Enrollment with Partner Programs

All efforts are to be made to enroll WIOA Title I participants with any partner program that is applicable to that participant's needs & circumstances. Examples may include enrolling a 22-year-old into the WIOA Title I Adult program as well as the WIOA Title I Youth program, because they would benefit from a youth program element not available through the Adult program, or enrolling a WIOA Title I Dislocated Worker participant into the Trade Act program through the VEC, for extended benefits following their employment termination.

Whatever program(s) an individual is enrolled into, they must meet the participation requirements of both/all. It is the duty of the WIOA Title I Program staff to ensure open lines of communication exist between staff all parties involved and information is shared, as necessary for program services to be provided and successfully completed.

Formatted: Space Before: 0 pt

Formatted: Normal, No bullets or numbering

Formatted: Font: Symbol, Not Expanded by /  
Condensed by



BLUE RIDGE REGION

#### **Additional Documentation Requirements**

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



BLUE RIDGE REGION

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.

Formatted: Indent: Left: 0"

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 logbooks 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).

<b>Title:</b>	Limited English Proficiency (LEP) Policy	<b>Effective Date:</b>	10/8/2018
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

### Purpose

This policy provides guidance to program staff and establishes the policy of the Greater Roanoke Workforce Development Board (GRWDB) in providing access to programs and services to Limited English Proficiency (LEP) populations in adherence to relevant federal, state, and local laws and regulations, including Executive Order 13166.

### References

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113-125, Section 188
- Title 29 Code of Federal Regulations (CFR) Part 38
- Department of Labor (DOL) Training and Employment Notice (TEN) 28-16, Change 2 – Best Practices, Partnership Models, and Resources Available for Serving English Language Learners, Immigrants, Refugees, and New Americans
- Presidential Executive Order 13166

### Definitions

- **Babel Notice** – a notice included on vital documents or electronic mediums (i.e. website, phone app, email, etc.) in multiple languages informing the reader that the communication contains vital information and explaining how to access language services to have the contents of the communication provided in other languages.
- **Employment-related Training** – Training that allows or enables an individual to obtain skills, abilities and/or knowledge that are designed to lead to employment.
- **LEP Individual** – an individual whose primary language for communication is not English and who has a limited ability to read, speak, write, and/or understand English. An LEP individual may be competent in English for certain types of communication (i.e. speaking or understanding), but still be LEP for other purposes (i.e. reading or writing).
- **Meaningful Access** – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.
- **Primary or Preferred Language** – An individual's primary or preferred language is the language in which an individual most effectively communicates, as identified by the individual.

### Policy

In regards to Equal Opportunity, the GRWDB acknowledges that national origin discrimination includes LEP populations under 29 CFR 38.9 and specifically states that in providing any aid, benefit, service, or training under a WIOA Title I financially assisted program or activity, a recipient must not, directly or

through contractual, licensing, or other arrangements, discriminate on the basis of national origin. Additionally, 29 CFR Section 38.41 added “LEP and preferred language” to the list of categories of information that each recipient must record about each applicant, registrant, eligible applicant/registant, and/or participant.

### **Procedure**

GRWDB staff (whether direct or indirectly through contracts or other agreements) are required to take reasonable steps to ensure that LEP individuals have meaningful access to federal WIOA Title I programs and activities. Reasonable steps may include, but are not limited to the following:

- Conducting an assessment of an LEP individual to determine their language assistance needs.
- Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English languages, to LEP individuals.
- Conducting outreach to LEP communities and/or populations to improve service delivery in needed languages.

Reasonable steps for providing meaningful access to training programs may include, but are not limited to, the following:

- Written training materials in appropriate non-English languages by written translation, or by oral interpretation, or summarization.
- Oral training content in appropriate non-English languages through in-person or telephone translation.

Furthermore, GRWDB staff should ensure that each program delivery method, whether it be in person, electronic, or by phone, conveys in the appropriate language how an LEP individual may effectively learn about, participate in, and/or access any aid, benefit, service, or training available to them. It should also be noted that as new methods for the delivery of information or assistance are developed, the GRWDB will take reasonable steps to ensure that LEP individuals remain able to learn about, participate in, and/or access any aid, benefit, service, or training available to them.

Language assistance generally comes in two forms: oral interpretation or written translation. Staff must ensure that above all, these services are free of charge and are provided in a timely manner. An LEP individual must be given adequate notice about the existence of interpretation and translation services and that they are available free of charge. Language assistance will be considered timely when it is provided at a place and time that ensures equal access and avoids the delay or denial of any aid, benefit, service, or training.

Staff shall not require an LEP individual to provide their own interpreter. Furthermore, staff shall not rely on an LEP individual’s minor child or adult family or friend to interpret or facilitate communication, except for the following circumstances:

- In emergency situations while awaiting a qualified interpreter.
- When the information conveyed is of minimal importance to the services to be provided.



For languages spoken by a significant portion of the population eligible to be served or likely to be encountered, vital information in written materials must be translated into these languages. These translations must in turn be readily available upon request in hard copy or electronically. Written training materials offered or used within employment-related training programs are excluded from these translation requirements. However, in all cases, staff must take reasonable steps to ensure meaningful access for LEP individuals.

For languages not spoken by a significant portion of the population eligible to be served or likely to be encountered, staff must take reasonable steps to meet the particular language needs of LEP individuals who seek to learn about, participate in, and/or access the aid, benefit, service or training that is available to them. Vital information may be conveyed orally if not translated.

Staff must also be sure to include a Babel Notice, indicating that language assistance is available in all communications of vital information. This includes letters or decisions in hard-copy or electronic formats.

Finally, to the extent otherwise required by 29 CFR Part 38, once a recipient becomes aware of the non-English preferred language of an LEP beneficiary, participant, or applicant for aid, benefits, services, or training, the recipient must convey vital information in that language.

<b>Title:</b>	Supportive Services Policy	<b>Effective Date:</b>	1/27/2017
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

## Purpose

To establish ~~guidelines-a policy~~ for the provision of supportive services using WIOA Title I Adult, Dislocated Worker, and/or Youth program funds.

## References

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113–128
- Policy 401-05 Change 1 Provision of Supportive Services
- TEGl 09-22

## Policy

Supportive services may be provided ~~only~~ to WIOA Title I Adult, Dislocated Worker, and/or Youth participants who are ~~participating actively~~ participating in WIOA Title I program ~~activities~~ and who are unable to obtain supportive services through other resources/programs. No ~~program operator may provide~~ supportive services shall be funded by a WIOA Title I program until other local area resources and/or programs (which provide the supportive service needed by the client) have been contacted to assess the availability of other funds or resources available for the supportive service. If it is confirmed that another organization a non-WIOA program can provide the supportive service needed by the client through another resource and/or program, the program staff will make a referral will be made for the participant. ~~However, if~~ alternative resources cannot be found, or the alternative resources are not timely to allow the participant to achieve their employment and/or training goals, then supportive services may be provided using WIOA Title I funds. The justification of the need for the supportive service to achieve employment and/or training goals or participate in WIOA Title I activities must be documented, if it is necessary to enable eligible individuals to participate in program activities under WIOA.

Supportive services that are available to WIOA Title I participants may include such services as:

- Transportation;
- Childcare;
- Assistance with the purchase of uniforms for occupational skills training, or appropriate work attire for work -based learning activities and/or employment;
- Training/work-related tools, and other reasonable expenses required to keep a participant in intensive services or training;
- Tests, reasonable accommodations, referrals to health care, books, school supplies, and certifications; ~~or~~
- ~~Other program activities—for example, auto repairs, test fees, rent, etc.~~

Needs related payments are not currently offered by the Greater Roanoke Workforce Development Board.

## Procedure

Supportive services may be provided either in kind or through cash assistance. To obtain payment for any supportive service, the participant or the service-providing vendor must provide appropriate documentation. Such documentation will include, at a minimum, the following:

- Justification for the need for supportive services (which must include training attendance records, documentation of miles traveled, receipts, etc.);
- A description of the supportive service provided;
- A list of all organizations contacted and why supportive services could not be obtained through such programs; ~~and~~
- An invoice or receipt for payment received (itemized and dated) for the supportive service.

Supportive services are intended as temporary assistance and should not be considered or provided as long-term support. ~~The P~~rovision of supportive services is not guaranteed and is contingent on availability of funding. All payments must be made directly to the vendor, when possible.

The total amount of supportive services shall not exceed \$2,000 per program year per participant. A waiver may be requested to exceed this amount but must be approved by the Executive Director or their designee prior to the supportive service being provided.

The following are special regulations established by the GRWDB to govern the provision of supportive services:

- ~~Transportation Assistance~~Travel Allowance: ~~Transportation assistance may be provided A travel allowance may be paid for to reimburse~~ travel to and from ~~a the~~ training facility which could include, but is not limited to, a training provider, employer, or other pre-approved vendor or location. ~~Transportation assistance~~Travel allowances will only be paid for travel on actual days participated only; and must be documented by an attendance record, ~~which is~~ signed by the appropriate activity representative at the facility and by the participant. Actual round-trip miles per day must be reported correctly by the participant. ~~Attendance documentation must be kept, and in no instance will~~No payments shall be made in advance for transportation assistance. The participant will be required to sign a receipt documenting payment received for the transportation assistance during the applicable period. Travel reimbursement ~~should be~~will be paid at the mileage rate set by the IRS annually, which can be found at <https://www.irs.gov/credits-deductions/individuals/standard-mileage-rates-at-a-glance>. ~~Transportation assistance~~ Travel Supportive Services may also be provided by utilizing a ride-share or on-demand transportation providers such as an Uber or Lyft, reserved and paid for by program staff. Other group transportation providers may be used for individual transportation, including but not limited to EverDriven, a provider that the GRWDB may utilize and schedule rides for a participant, and/or other travel means if but must be authorized by the Executive Director or their designee ~~Director level staff~~ prior to the supportive service request being approved. ~~Travel/mileage will be reimbursed for no more than \$2,000 per program year per participant.~~

- Childcare Assistance: To receive child-care ~~assistance payments~~, participants must show evidence of the need, and such payments can be made only when it has been documented that participants cannot afford to ~~pay~~ pay for the childcare themselves. Payment will be made only for those days the participant attends training and/or employment activities and the child is present at the childcare facility. To document the actual cost of child-care that has been provided, the participant must ~~furnish~~ provide a completed Documentation of Child-~~c~~Care Form, which gives the dates and hours per day of child-care, ~~and~~ the signature of the child-care provider (including date form is signed) and the cost of the child care provided. ~~as well as t~~The training attendance record which is signed by the appropriate activity representatives and the participant must be attached to the Documentation of Childcare Form at the facility and by the participant. As stated above, in ~~n~~No childcare assistance instance will payments will be made in advance. Payments will be made directly to the vendor or childcare provider. The participant will be required to sign a receipt documenting payment received for the applicable period. Childcare expenses will be reimbursed for no more than \$2,000 per program year per participant.
- Assistance with Training Uniforms, Work Attire and Related Tools: To receive assistance with training uniforms, ~~or~~ appropriate work attire, and/or training/work-related tools, the participant must show evidence of need and the inability to pay for the items ~~themselves~~ himself or herself. Documentation will consist of a completed Supportive Service Request form prior to the purchase of any items, and an invoice (itemized and dated) for the items purchased. The GRWDB may choose to use a specific vendor for the items, including but not limited to Super Shoes, and a voucher may be provided directly to the vendor outlining the items that may be purchased. The items listed on the voucher are the only items that will be paid for and any other items purchased by the participant will not be paid for by the GRWDB. The GRWDB may reimburse participants directly for the purchase of uniforms, work attire, and/or related tool, but prior approval must be provided and documentation must be in place for this to occur. If reimbursement is made directly to the participant, the GRWDB must receive an itemized receipt showing date, time, and all purchases made from the approved store or vendor prior to processing. The participant will be required to sign a receipt documenting payment received for the applicable period. Uniforms, tools, and attire will be reimbursed for no more than \$2,000 per program year per participant.
- Tests, reasonable accommodations, referrals to health care, books, school supplies, and certifications: To receive assistance with these expenses, the participant must show evidence of need and the inability to pay for the expenses themselves. Documentation will consist of a completed Supportive Service Request form prior to the purchase of any items or the completion of any assessments, tests, or examinations. The GRWDB will work directly with the vendor for such items listed above and a voucher will be provided directly to the vendor outlining the items that may be paid for on behalf of the participant. No additional items that are not listed on the voucher may be paid for by the GRWDB. The GRWDB may reimburse participants directly for purchases of the items above, but prior approval must be provided, and documentation must be in place for this to occur, and an invoice (itemized and dated) for the expenses needed If reimbursement is made directly to the participant, the GRWDB must receive an itemized receipt showing date, time, and all purchases made from the approved store or vendor prior to

~~processing. The participant will be required to sign a receipt documenting payment received for the applicable expense. These expenses will not exceed \$2,000 per program year per participant.~~

- **Food:** On a limited basis, and in certain situations, food at a reasonable cost may be provided to WIOA Title I Youth program participants as a supportive service. Food may be provided to eligible Youth when it will assist or enable the participant to participate in allowable WIOA Title I Youth program activities and to reach his/her employment and training goals. ~~thereby achieving the program's overall performance goals.~~ The Use of funds for food should be limited to reasonable and necessary purchases that are coordinated, when possible, with other community, state & federal services that provide food for low-income individuals. Food would will only be provided purchased with by WIOA Title I program fundings when the program services/ and/or activities occur during last throughout a normal mealtime portion of the day. When food purchases are made, the GRWDB will work directly with a vendor and purchase the food on behalf of the participants. Attendance records will be taken and will include a signature from the participant for attending the program service and/or activity. This documentation will be included in the participant files along with documentation of the food purchase and the agenda/schedule of the service and/or activity showing that it occurred during normal mealtime hours. and would be purchased by a vendor payment, when at all possible. These expenses will not exceed \$2,000 per program year per participant.
- **Other:** Other needed supportive services to help an individual remain in training or be able to successfully complete program participation, not specified in the above sections, and which the trainee cannot afford, may be provided on a case-by-case basis. Each situation will be evaluated as the need arises, and determination of whether support is needed will be made by the Board Director by way of a waiver request from staff. Proper documentation and verification are required. The participant will be required to sign a receipt documenting payment received for the applicable period.

Funding of training and supportive services combined may not exceed a total of ~~\$55,000~~ in a program year. 12-month period. ~~A waiver may be requested to exceed this amount but must be approved by the Executive Director or their designee prior to the supportive service being provided. Any excess costs of training and/or supportive services over the \$5,000 limit will be communicated to the WIOA Title I participant prior to the enrollment into training and/or employment activities to determine the participant's ability to contribute to the cost of training, or to complete an assessment of any other funding sources for training and/or employment activities. All WIOA registrants will be made aware of any excess cost of training not covered by the program and for which they will be responsible. Program operators are expected to work closely with participants to determine the individual's 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.~~

Any Ppayments that are made directly to elients-WIOA Title I participants must be sufficiently documented, including showing documentation of the need, proof of payment, and proof of receipt of payment and/or service. This could include copies of the check/check payments/vouchers, participant

signature(s) acknowledging receipt of payment, or printout showing the funds loaded to a credit, debit, or other direct payment card. (i.e.: computer printout showing funds loaded to card, copy of check payment/voucher, client signature acknowledging they received payment).

#### Waivers

~~A waiver to the above maximum specifications may be requested from GRWDB director on a case-by-case basis. Waivers must be submitted to and approved by the Director prior to the expenditure of funds. The necessity for waiver must be sufficiently justified documented for a waiver to be approved.~~

<b>Title:</b>	Incumbent Worker Training Policy	<b>Effective Date:</b>	1/27/2017
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

## Purpose

To establish ~~the local policy and procedure on regarding implementing~~ Incumbent Worker Training funding activities through the Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker programs.

## References

- VWL 16-05 Change ~~24~~ Incumbent Worker Training
- ~~VWL 16-05 Change 1 Attachment A Incumbent Worker Training Data Entry Process~~
- ~~VWL 16-05 Change 1 Attachment B Incumbent Worker Training Eligibility Documentation~~
- ~~VWL 16-05 Change 1 Attachment C Incumbent Worker Training Required Data Elements~~
- Workforce Innovation and Opportunity Act ~~of 2014 Section 122 and Section 134~~ (WIOA) Public Law 113-128
- Training and Employment Guidance Letter (TEGL) WIOA No. 03-15, ~~Guidance on Services Provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act and Wagner Peyser, as Amended by WIOA, and Guidance for the Transition to WIOA Services~~
- ~~Workforce Innovation and Opportunity Act; Employment and Training Administration; Labor Final Rule, Subpart F—Work Based Training Sections 680.700 through 680.840~~
- Virginia Board of Workforce Development (VBWD) Policy 403-04 Incumbent Worker Training

## Policy

Incumbent Worker Training (IWT) is a form of ~~work-based~~ training that is designed to ensure that employees of a company ~~are able to~~ can acquire the skills necessary to retain employment and advance ~~within the company~~, thus creating backfill opportunities for the employer. ~~IWT can also be used, or, to provide skills necessary to avert a layoff or reduction in force. IWT It is designed to either assist workers in obtaining the skills necessary to retain employment or to avert layoffs and~~ must increase both ~~thea~~ employee participant's and a company's competitiveness. ~~Incumbent Worker Training IWT~~ may be provided to a single firm or a group of firms that share similar needs using WIOA Title I Adult and Dislocated Worker funding. ~~s Funds and~~ are paid directly to the employer or designated entity for a group of employers for ~~the~~ reimbursement ~~for of~~ training costs. Up to 20% of local WIOA Title I Adult and Dislocated Worker program ~~formula allocated~~ funds may be reserved and used to pay for the federal share of the cost of providing ~~IWT a training program for incumbent workers~~. Statewide rapid response funds may also be requested from the ~~Virginia Community College System Virginia Department of Workforce Development and Advancement (Virginia Works)(VCCS)~~ for additional ~~Incumbent Worker Training IWT~~ activities beyond local formula funds.

## Procedure

### Employer Eligibility

All employers that request funding for ~~Incumbent Worker Training~~IWT will be evaluated based on the following criteria:

- ~~• Demonstration of linkages of the training activity to demand occupations and/or regionally targeted industries.~~
- ~~• All training will be for occupations identified as in demand in the labor market and determined to be of priority in the region's Local Plan.~~
  - ~~○ Staff may request a waiver for 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. (No more than 5% of funds budgeted annually by line item and by program may be available for waivers) Waiver documentation must include, at a minimum:~~
    - ~~▪ Justification by the employer of the industry being in demand~~
    - ~~▪ Statement by the employer noting anticipated growth of the occupation(s)~~
    - ~~▪ Local labor market information, including data and at least 3 job different job openings paying a self-sufficient wage for the occupation(s) connected to the training~~
- The positive relationship of the training to the competitiveness of ~~a participant~~the employee(s) and the employer(s).
- The relative wage and benefit levels of those employees (pre-training and anticipated upon completion of the training). Employees participating in Incumbent Worker Training activities must earn, or be eligible for a wage gain to earn, at least the hourly living-wage identified for the locality in which the business resides.
  - The living-wage for each locality can be found using the Massachusetts Institute of Training's Living Wage Calculator found here: <https://livingwage.mit.edu/>.
- The potential state, regional, and local economic impact, if any, of the training project.
- Demonstration of linkages of the training activity to high-demand occupations and/or regionally targeted industries as identified in the Local Plan.
  - Staff may request a waiver for IWT opportunities that are outside of the identified high-demand occupations and/or target industries. Waivers must be requested, with all required documentation, and approved by the Executive Director or their designee prior to approving funding for the IWT. Waiver documentation must include, at a minimum:
    - Justification by the employer of the industry being in-demand
    - Statement by the employer noting anticipated growth of the occupation(s)
    - Local labor market information, including data and at least 3 job different job openings paying a self-sufficient wage for the occupation(s) connected to the training

### Employee Eligibility

Because of the unique nature of ~~the Incumbent Worker Training~~IWT program, where the ~~WVWDB~~Greater Roanoke Workforce Development Board (GRWDB) evaluates the employers for



eligibility consistent with §680.810, ~~individuals-employees~~ receiving ~~Incumbent Worker Training-IWT~~ are not subject to the same eligibility criteria that apply to participants in the WIOA Title I Adult ~~and/or~~ Dislocated Worker programs, unless they are also receiving other services under those programs. Therefore, ~~employees individuals~~ who only receive ~~Incumbent Worker Training-IWT~~ services and no other WIOA Title I Adult and/or Dislocated Worker ~~formula~~ services, do not fall within the definitions of “participant” in 20 CFR §677.150(a). As such, those that are receiving only ~~Incumbent Worker Training IWT~~ shall be reported as an “individual” and not a WIOA Title I program “~~participant~~”.

To report employees as individuals as stated above, the following eligibility must be documented on all employees participating in ~~incumbent worker training IWT~~:

- The employee is at least 18 years of age
- The employee is a citizen of the United States or a non-citizen whose status permits employment in the United States
- If the employee is a male born on or after January 1, 1960, verification of registration with the United States Selective Service system within 30 days after their 18th birthday or before they reach the age of 26
- The employee’s employment meets the Fair Labor Standards Act requirements for employer-employee relations
- The employee has an established employment history with the employer for 6 months or more
  - ~~In the event that~~If the ~~Incumbent Worker Training IWT~~ is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for 6 months or more as long as the majority (51%) of those employees being trained meet the employment history requirement.
- The employee is a paid, full-time employee that works at a facility located in Local Workforce Development Area (LWDA) 3 ~~or~~ works for a staffing agency and is placed at a facility in LWDA 3.

### **Funding Parameters**

Employers participating in the program are required to pay for the non-Federal share of the cost of providing the ~~training to incumbent workers IWT~~ ~~of to~~ the employee ~~esrs~~. The non-Federal share shall not be less than:

- 10 percent of the cost, for employers with not more than 50 employees
- 25 percent of the cost, for employers with more than 50 employees but not more than 100 employees and
- 50 percent of the cost, for employers with more than 100 employees.

~~Incumbent Worker Training IWT~~ per program year (July 1 – June 30) may not exceed \$~~32,500-000~~ per employee and \$~~85~~,000 in total. Exceptions to these maximum amounts may be approved by review & approval of the ~~Western Virginia Workforce Development Board~~ ~~full GRWDB~~, only if done ~~PRIOR~~ ~~prior~~ to ~~the~~ obligation/authorization ~~or the start of training~~.

Examples of costs that are covered by Incumbent Worker Training funds includes:

- Training programs for participants for productive, high demand employment
- Work-site-based learning strategies using cutting-edge technology & equipment
- Training programs incorporating technological changes in the workplace
- Training programs designed to impart learning to meet employer-specified or industry-specific skills
- Train-the-trainer instruction to build the capacity of businesses to effectively respond to the challenges of an increasingly diverse workforce
- Consumable training materials & supplies
- Textbooks
- Off-site facility rental expense directly related to and necessary for the training
- Rental of tools and equipment critical to the training
- Travel expense and per diem of instructor
- Instructor/trainer fees

Examples of costs that will not be covered by Incumbent Worker Training funds includes:

- Costs incurred prior to the approval date of the application
- Construction or purchase of facilities or buildings
- Business relocation expenses
- Employment or training in sectarian activities
- Lobbying activities
- Employee participant wages
- Travel expenses and/or per diem of employees

The WVWDB-GRWDB and any employer that receives funding for ~~Incumbent Worker Training~~IWT will follow all current and future guidance provided by state ~~&and~~ federal agencies. Employers wishing to receive funding for ~~Incumbent Worker Training~~IWT must complete the ~~WVWDB's-GRWDB's~~ Incumbent Worker Training-IWT Application and submit required documentation to the WVWDBGRWDB-staff. The employer may select the training provider for ~~Incumbent Worker Training~~IWT, but if the employer requires assistance with identifying applicable training providers, the WVWDB-GRWDB is able to assist in this manner.

WVWDBGRWDB staff will review submitted and complete applications for adherence to federal, state ~~&and~~ local policies. WVWDB-GRWDB staff will also evaluate applications based on the availability of funding. If determined eligible for funding, WVWDB-GRWDB staff will work with the employer to obtain additional required information for documenting ~~participating~~ employees' eligibility. Applicable information and documentation will be entered and uploaded into the Virginia Workforce Connection (VaWC), as required by federal and state policy. Upon completion of training and/or reimbursement for training, the employer must submit documentation of expense and training reimbursement request to WVWDB-GRWDB staff for processing. Upon receipt of acceptable documentation, reimbursement

payment will be processed for employer within 45 days of receipt of complete and accurate reimbursement request.

<b>Title:</b>	Adult & Dislocated Worker Incentives Policy	<b>Effective Date:</b>	9/28/2023
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

## Purpose

To outline process for the payments of incentives to Workforce Innovation and Opportunity Act (WIOA) Title I Adult & Dislocated Worker program participants.

## References

- Workforce Innovation & Opportunity Act (WIOA) PUBLIC Public Law 113–128  
~~Workforce Innovation & Opportunity Act (WIOA)~~
- 2 Code of Federal Regulations (CFR) 200.75
- 2 CFR 200.456
- 2 CFR 200.407(t)
- 20 CFR 683.200(b)(2)
- 2 CFR 200.1

## Definitions

- Incentive – An inducement or reward intended to motivate achievement, progress, and/or attendance with a training or employment activity.

## Policy

Incentives may be provided to eligible WIOA Title I Adult ~~and/or~~ Dislocated Worker program participants to recognize achievements of milestones directly related to training or employment activities~~services~~. All incentives are based upon the availability of funding. Incentives must meet cost principles ~~outlined~~ in Uniform Guidance under 2 CFR 200. Incentives may not include entertainment such as movies or sporting event tickets, or gift cards to movie theatres or other venues whose sole purpose is entertainment. The Greater Roanoke Workforce Development Board (GRWDB) does not provide incentives via gift cards. Incentives shall be provided to individuals using a check or direct deposit, accompanied by appropriate documentation of the achievement.

## Procedure

The justification and strategy for awarding incentives is administered in a manner that ensures all participants receive equal rewards for equal achievement. ~~For the purposes of this policy, the term “incentive” shall mean an inducement or reward intended to motivate achievement, progress, and attendance. The~~ An incentive provided to an eligible program participant must be directly linked to one of the allowable program services listed in WIOA Title I or to the attainment of specific and measurable program outcome(s).

Participants cannot receive multiple incentives payments for the same activity, other than exceptions noted in this policy. The maximum amount to be expended per participant per year is \$~~8~~5,000 total, which

~~can be any combination of combined between~~ training and supportive services expenses. Funds allocated to a participant for ~~Adult or Dislocated Worker I~~ incentives will count towards the \$85,000 maximum per year. All incentive awards are subject to the availability of WIOA Title I funds are not an entitlement.

Achievements eligible for an incentive include (with maximum amounts to be provided):

Incentivized Activity	Amount
Attainment of <del>a High School Diploma/GED-Secondary Credential</del> or its <del>recognized</del> equivalent	<del>\$150</del> <u>250</u>
<del>Completion-Passing grade on</del> with passing grade of one test <del>for each section</del> toward the GED. <u>Participants may receive an incentive for passage of <i>each</i> of the tests toward the GED, outlined below.</u>	<del>\$50</del> <u>100</u>
<ul style="list-style-type: none"> <li>Mathematical Reasoning</li> <li>Reasoning through Language Arts</li> <li>Social Studies</li> <li>Science</li> </ul>	
<del>Complete TABE post-test documenting increase in basic literacy levels, categorized as a attainment of measurable skills gain, for WIOA Title I performance</del>	<u>\$100</u>
Attainment of Career Readiness Certification (Bronze level or higher)	\$100
Completion of Occupational Skills Training	<del>\$50</del> <u>100</u>
Attainment of industry recognized credential	<del>\$200</del> <u>100</u>
<del>Completion of an entrepreneurial training and/or attainment of a business license or it's equivalent</del>	<u>\$100</u>
<del>Retention of employment for 90 consecutive days</del>	<u>\$100</u>
Successful completion of a Work Experience/Internship	\$200
Attainment of a Measurable Skills Gain	<del>\$50</del> <u>100</u>

WIOA Title I program staff shall maintain required documentation in the participant's case file detailing the achievement, distribution, receipt, and management of incentives. At a minimum, WIOA Title I ~~p~~Program staff shall document the need for the incentive and justify issuance of the incentive in the participant's ~~Individual Employment Plan and~~ in the statewide system of record, the Virginia Workforce Connection ~~system~~ (VaWC). Staff will also upload documentation with signature (printed or electronic) verifying the type of incentive that was awarded and the receipt of the incentive by the participant. It is the responsibility of staff to become aware of all applicable regulations and to monitor ~~personnel and~~ participant activities to ensure compliance in accordance with this policy and other cited references.

<b>Title:</b>	Youth Incentives Policy	<b>Effective Date:</b>	1/27/2017
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

### Purpose

To outline the process for the payments of incentives to Workforce Innovation and Opportunity Act (WIOA) Title I Youth program participants.

### References

- Workforce Innovation & Opportunity Act (WIOA) ~~PUBLIC~~ Public Law ~~LAW~~ 113–128  
~~Workforce Innovation & Opportunity Act (WIOA)~~
- 20 CFR §681.640
- TEGL 19-16
- Training and Employment Guidance Letter (TEGL) 21-16, Change 1 Third WIOA Title I Youth Formula Program Guidance
- 2 Code of Federal Regulations (CFR) 200.75
- 2 CFR 200.456
- 2 CFR 200.407(t)
- 20 CFR 683.200(b)(2)
- 2 CFR 200.1

### Definitions

- Incentive – An inducement or reward intended to motivate achievement, progress, and/or attendance with a training or employment activity.

### Policy

Incentives may be provided to eligible WIOA Title I Adult and/or~~&~~ Dislocated Worker program participants to recognize achievements of milestones directly related to training or employment activities~~services~~. All incentives are based upon the availability of funding. Incentives must meet cost principles outlined in Uniform Guidance under 2 CFR 200. Incentives may not include entertainment such as movies or sporting event tickets, or gift cards to movie theatres or other venues whose sole purpose is entertainment. The Greater Roanoke Workforce Development Board (GRWDB) does not provide incentives via gift cards. Incentives shall be provided to individuals using a check or direct deposit, accompanied by appropriate documentation of the achievement.

### Procedure

The justification and strategy for awarding incentives is administered in a manner that ensures all participants receive equal rewards for equal achievement. For the purposes of this policy, the term “incentive” shall mean an inducement or reward intended to motivate achievement, progress, and attendance. The An incentive provided to an eligible program participant must be directly linked to one of

**Formatted:** Font: (Default) Times New Roman, 11 pt

**Formatted:** Right: 0", Space Before: 0 pt, Don't add space between paragraphs of the same style, Line spacing: Multiple 1.16 li, Widow/Orphan control, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.57"

the allowable elements listed in WIOA Title I or to the attainment of specific and measurable program outcome(s). All incentive awards are subject to the availability of WIOA Title I funds are not an entitlement.

Participants cannot receive multiple incentives payments for the same activity, other than exceptions noted in this policy. The maximum amount to be expended per participant per year is \$~~8~~5,000 total, which can be any combination of -combined between training and supportive services expenses. Funds allocated to a participant for ~~Adult or Dislocated Worker II~~ incentives will count towards the \$~~8~~5,000 maximum per year.

Achievements eligible for an incentive include (with maximum amounts to be provided):

Incentivized Activity	Amount
Attainment of <u>a High School Diploma/GED-Secondary Credential or its recognized equivalent</u>	<del>\$150</del> <u>250</u>
<del>Completion-Passing grade on</del> <u>with passing grade of one test for each section toward the GED. Participants may receive an incentive for passage of each of the tests toward the GED, outlined below.</u>	<del>\$50</del> <u>100</u>
<ul style="list-style-type: none"> <li>Mathematical Reasoning</li> <li>Reasoning through Language Arts</li> <li>Social Studies</li> <li>Science</li> </ul>	
<u>Complete TABE post-test documenting increase in basic literacy levels, categorized as a attainment of measurable skills gain, for WIOA Title I performance</u>	<del>\$100</del>
Attainment of Career Readiness Certification (Bronze level or higher)	\$100
Completion of Occupational Skills Training	<del>\$50</del> <u>100</u>
Leadership Development Opportunities	\$50
Attainment of industry recognized credential	<del>\$200</del> <u>100</u>
<del>Completion of an entrepreneurial training and/or attainment of a business license or it's equivalent</del>	<del>\$100</del>
<u>Retention of employment for 90 consecutive days</u>	<del>\$100</del>
Successful completion of a Work Experience/Internship	\$200
Attainment of a Measurable Skills Gain	<del>\$50</del> <u>100</u>
<u>Successful completion of a Summer Boot Camp Work Experience</u>	<del>\$100</del>

WIOA Title I program staff shall maintain required documentation in the participant's case file detailing the achievement, distribution, receipt, and management of incentives. At a minimum, WIOA Title I ~~p~~Program staff shall document the need for the incentive and justify issuance of the incentive in the participant's ~~Individual Employment Plan and~~ in the statewide system of record, the Virginia Workforce Connection ~~system~~ (VaWC). Staff will also upload documentation with signature (printed or electronic) verifying the type of incentive that was awarded and the receipt of the incentive by the participant. It is the responsibility of staff to become aware of all applicable regulations and to monitor ~~personnel and~~ participant activities to ensure compliance in accordance with this policy and other cited references.

<b>Title:</b>	On-the-Job Training Policy	<b>Effective Date:</b>	1/27/2017
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

### Purpose

The purpose of this policy ~~and procedure~~ is to establish guidelines for the arrangement of ~~an~~ On-the-Job Training (OJT) opportunity, where an individual ~~is will be~~ able to learn an employment related skill or qualify for a particular occupation through demonstration and practice on-site at their place of employment.

### References

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128
- VBWD Policy 403-03, On-the-Job Training, Change 1
- VBWD Policy 401-04 Change 1 Provision of Training Services
- 20 CFR 680.700-750
- TEGL 19-16
- GRWDB Complaints & Grievances Policy

### Policy

It is the policy of the Greater Roanoke Workforce Development Board (GRWDB) to allow as part of WIOA program participation, where applicable, eligible individuals to engage in OJT to successfully re-enter and/or remain a part of the workforce. During the OJT- opportunitywork based learning, a participant is employed and engaged in productive work in a job for which he or she is paid. ~~A~~ participant is employee will be considered employed if they are ~~employed and~~ receiving work hours, pay and benefits similar to other employees in the same position at ~~of the same~~ employer. Employers must also have, or forecasts to have, sufficient work to provide long-term regular employment for OJT participants.

### Procedure

#### Participant Eligibility

Eligible participants who are enrolled in the WIOA Title I Adult, Dislocated Worker, and/or Youth programs may enter an OJT opportunity under the following conditions:

1. Unemployed ~~P~~participants who, after assessment if applicable and in accordance with the Individual Employment Plan (IEP), ~~have~~ an identified skills gap and/or substantial need for OJT.
2. Employed participants ~~worker(s)~~ when:
  - a. The employee is not earning a self-sufficient wage as determined by GRWDB policy.
  - b. 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 GRWDB ~~and~~
  - c. The OJT is provided through a contract with an employer or ~~R~~Registered ~~a~~Apprenticeship program sponsor.

Formatted: No underline



3.i. Participants of a ~~R~~Registered ~~a~~Apprenticeship can receive funding for the OJT portion of their ~~work process apprenticeship~~. OJT funds can be used for the OJT portion only. An ITA may be considered for use for the Related Technical Instruction~~instructional piece~~ aspect of the Registered aApprenticeship.

Formatted

#### Employer Eligibility

Eligible employers ~~may~~ be in the public, ~~private~~ non-profit, or private sector and must also meet the following requirements:

1. Must have adequate personnel to provide sufficient supervision and training to the OJT participant.
2. Must provide a minimum of 50% of the ~~employee's~~ OJT participant's wages throughout the training.
3. Must provide benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
4. Must not have exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages and employment benefits, including health benefits, and working conditions at the same level as other employees working a similar length of time and doing the same type of work. An employer will be considered to have exhibited a pattern if more than one instance of that activity has been documented.
- 4.5. ~~Must~~ not have relocated from any location in the United States within 120 days, if the relocation resulted in any employee losing his or her job at the original location.
- 5.6. Must not use OJT assignments to displace regular employees, or to replace any employee on permanent or temporary layoff; status.
- 6.7. Must agree that the OJT contract is limited to the time needed for the participant to become proficient in the occupation for which training is provided.
- 7.8. Must provide a Federal Employer Identification number to demonstrate the business is a legitimate employer with full-time employees, and conducting trade or business at an appropriate worksite.
- 8.9. Must maintain ~~workers~~ workers' compensation insurance and provide a Certificate of Insurance issued by the company's insurance carrier.
- 9.10. The Employer must be the actual employer of record for all participant wages. A temporary or payroll agency may not serve as the employer of record; and.

#### Target Industries/Occupations for OJT Opportunities

~~40-~~ All OJT opportunities will align with training will be for occupations or career pathways to occupations identified as ~~high-~~ demand in the regional labor market and determined to be of priority by the GRWDB in the current Local Plan.

Formatted: Underline

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Normal, No bullets or numbering

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Font: (Default) Times New Roman, 11 pt

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 either the

Executive GRWDB Director or their designee prior to approving funding for the participant/employer.

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 GRWDB our Eligibility policy) for the occupation connected to the training-

These items must be attached to the waiver request form to the GRWDB Executive Director or their designee. ~~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.).~~

#### OJT Determination and Appeal Process

Any determination that an employer is ineligible to participate in an OJT ~~contract opportunity~~ will be made jointly by the ~~Business Services Staff and the~~ Executive Director, or their designee, of the GRWDB, by reviewing the eligibility requirements above and any and all applicable documentation that verifies the employer does not meet those requirements. ~~An employer will be considered to have exhibited a pattern if more than one instance of that activity has been documented.~~ Any employer that is deemed ineligible to participate in an OJT contract may file a complaint and/or grievance, as outlined in the ~~local~~ GRWDB's Complaints and Grievances Policy.

Formatted: Underline

#### Payments to Employers

~~4-~~ Payments to employers are made on a reimbursement basis for documented wages from hours worked. Payments ~~are~~ deemed to be compensation for the extraordinary costs associated with training participants including additional supervision, additional training, and the costs associated with the lower productivity of the participants, and ~~those~~ extraordinary costs need not be documented by the employer. Payments shall not be in excess of 50% of the wage rate of the OJT participant, and 2.1. Must not be in excess of 50 percent of the wage rate of the OJT participant.

Formatted: Normal, No bullets or numbering

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Font: (Default) Times New Roman, 11 pt

Formatted: Font: (Default) Times New Roman, 11 pt

#### Reimbursement Amount

An OJT contract must be limited to the period required for a participant to become proficient in the job for which the training is designed. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the job, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan.

Reimbursement to the employer shall be provided for 50% of the ~~OJT employee~~ participant's wages up to a maximum of ~~\$85,000~~, minus any funds spent on other training methods (i.e.: ~~Occupational~~ Skills ~~Training~~ through an Individual Training Account (ITA), etc.). The length of time approved for the OJT will depend on the amount of training that the participant will require in the new position and the amount of funding allocated toward the reimbursement.

A comparison between the resume ~~of the OJT participant~~ and/or their current skills ~~of the participant~~ and the skills/requirements of the job ~~per the job~~ description ~~provided by the employer~~ will be ~~completed~~ ~~done~~ to calculate the amount of reimbursement provided to the employer. For example, if the job description has ten (10) main functions that are required for an employee to be proficient in the job, and the employee possesses the skills to perform 8 out of 10 of those functions, then the participant will require training on 20% of the job. This percentage (20%) is the percentage of the maximum \$85,000 that can be paid out. Here, the person would have a maximum OJT expenditure of \$16,000 (20% of the \$85,000 maximum).

~~Participants are marketed to employers as eligible for OJT by GRWDB staff. A review of the employer will ensure that the employer has, or forecasts, sufficient work to provide long term regular employment for the participant.~~

#### OJT Contract

The ~~employer will provide a~~ job description ~~provided by the employer shall be~~ of the occupation as performed in the company. ~~The GRWDB staff will work with the employer to develop and~~ a concise outline of the OJT ~~opportunity to be given, including~~ tasks to be learned, and the approximate hours of training required for each task. Once this information is provided/~~developed~~, GRWDB staff will determine the length of the training period and the total reimbursement ~~and will finalize that will be provided by the OJT contract and other documentation.~~

If the employer is agreeable to the length of training and the reimbursement amount, then ~~the GRWDB and the employer will sign off on the contract an OJT contract will be prepared.~~ This contract must be in place prior to the start ~~date~~ of training/~~employment~~. ~~When the contract is completed, it will be provided to the employer for his or her signature. After the employer has signed the contract, the appropriate official will sign for the WIOA.~~

The employer will ~~be required to~~ submit a timesheet and invoice for review and approval ~~at a minimum of once a month. This invoice should be submitted to the GRWDB electronically, using the outlined process provided by the GRWDB, by the 15<sup>th</sup> of each month for the month's prior payroll/expenditures. GRWDB staff will review the invoice for accuracy and allowability per federal, state, and local policy.~~ -Once the invoice is ~~reviewed and approved and signed,~~ it will be submitted for payment ~~and processing.~~ The GRWDB will then reimburse the employer for training costs ~~as outlined above, in line with the parameters and training plan detailed in the OJT contract.~~ Copies of invoices, timesheets and payment processing documentation will be included in WIOA Title I participant case file.

<b>Title:</b>	Individual Training Account (ITA) Policy	<b>Effective Date:</b>	1/27/2017
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

## Purpose

This policy is intended to define and establish parameters for Individual Training Account (ITA) development and utilization expenditures through the Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth programs. The purpose of ITAs training is to provide eligible participants 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 I Public Law 113-128
- VWL 16-06 Change 1 Eligible Training Provider and Programs List
- VBWD Policy 401-04, Change 1 Provision of Training Services It
- VWL 20-06 Virginia Workforce Connection (VaWC) Services Codes

## Policy

A WIOA Title I-eligible participant ~~is~~may be enrolled into a training program if the Individual Employment Plan (IEP) supports that ~~the~~ training is necessary to transition the participant into self-sufficient employment.~~the workforce.~~ The training must-shall support the stated purpose of WIOA Title I and be in accordance with the description of training as contained in the ~~Aet~~legislation. ITAs will only be issued to training providers that have been added and maintained inclusion on the Commonwealth of Virginia's Eligible Training Provider List (ETPL). Whenever feasible, the Greater Roanoke Workforce Development Board (GRWDB) will work with training providers~~vendors~~ to review credit-for-prior learning qualifications if participants have completed coursework from other ~~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 providers and/or 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~~ WIOA Title I participants that have requested~~of~~ training funds through an ITA must be eligible based upon criteria established under the ~~Aet~~ WIOA Title I legislation. 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). WIOA Title I requires the coordination of training costs with funds available under other grant assistance (WIOA Section 134). WIOA Title I 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 other grant assistance. Other grant assistant sources can include, but are not limited to, federal Pell grants, Workforce Credentials Grant (FastForward), G3 funding, or FANTIC funding from the Virginia Community College System (VCCS), or private scholarships and foundation funding. It is critical that other sources be sought out first -from other sources, including PELL Grants but excluding loans, to pay the costs of such training-to avoid duplication of payment. All Individuals participants must maintain an active application ~~status~~ for PELL-ell grant assistance, as applicable, through the duration of the training. 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.~~

~~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 self-sufficient employment. All training will be in industries and for occupations identified as high in demand in the labor market and determined to be of priority by the Greater Roanoke Workforce Development Board (GRWDB), as stated 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 GRWDB either the Executive Director or their designee 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;
- 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~~ GRWDB policy) for the occupation connected to the training.

These items must be attached to the waiver request form to ~~at the GRWDB Executive Director~~ or their designee. ~~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. This funding maximum may be exceeded if approved by ~~a the Executive~~ Director or their designee through a ~~W~~waiver request ahead of the funds being obligated.

#### Training Selection

Training ~~through an ITA~~ will be ~~provided~~approved for ~~priority high-demand~~ occupations ~~and industries identified in the Local Plan~~. Any providers or programs reviewed and selected by a participant to provide the training must be included ~~only as determined by the Board by an institution or organization certified as meeting the criteria and having completed the procedures outlined in the Commonwealth of Virginia's Eligible Training Provider Certification List~~policy. Participants have ~~the~~ choice of any ~~approved~~ provider and approved program that is on the statewide ETPL housed within the system of record, ~~the VAWC~~, as long as it provides skills and training to obtain employment in or on a career pathway to a high-demand occupation and industry. ~~Once a training program and provider has been chosen, the WIOA Title I participant will designate this choice on the Customer Choice-in-Training Form and a Training Plan will be completed with information on the chosen provider, the cost, the duration, and other details on the training.~~

Approval for ~~local~~ funding ~~through an ITA~~ is also based on ~~will also, however, will~~ be based on ~~additional criteria including listed within this policy as well as funding limitations, priority of service, and other criteria in this policy and other policies of the GRWDB, within supportive services that may be required for trainings. Participants must complete the Training Plan, acknowledging their choice, and this form must be kept in the participant's program file.~~

#### Length of Training

Training length will vary according to the type of training and the requirements for completion. Because entering or returning to the workforce is a priority under WIOA Title I ~~training~~, training ~~cannot~~must not exceed more than 24 ~~calendar~~ months. Training should also lead to an industry-recognized ~~certification credential~~ and employment that earns a sustainable wage. ~~If a situation arises that a Participant's requests or needs a training whose IEP includes training lasting more than 24 months, the rationale and justification must be documented in the participant's IEP, and must request a waiver from a the Executive GRWDB Director or their designee must be received prior-PRIOR to the start of 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 also request a waiver to continue receiving funds for training through an ITA.~~

#### Repeat Training

The GRWDB will ~~NOT~~not provide funding for ~~unsuccessful training courses/programs that was previously funded with WIOA Title I program funds but not successfully completed.~~

#### Cost Limitation

The ~~local~~ GRWDB limits training cost to no more than \$~~53,050~~00 per participant within a ~~twelve-month program year period, except as approved by a GRWDB Director prior to the expenditure of funds via a waiver.~~ Funding of training and supportive services combined may not exceed a total of \$~~85,000~~ in a ~~12-month period program year.~~ A waiver may be requested to exceed the amounts listed above but must be approved by the Executive Director or their designee prior to funds being expended in excess of the maximum amounts per program year. ~~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 staff 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.

WIOA Title I training funding is always a payor of last resort. This means all other funding sources should be explored for potential payment, prior to WIOA Title I funds being obligated and/or expended for training. Examples may include scholarships, federal financial aid, other private or public grant funding, etc. Furthermore, if a participant chooses a training which has a cost higher than that of the approved ITA limit, the GRWDB does not encourage participants to secure loans to pay the difference. The source of payment for remainder of amount due would be participant responsibility and should be verified prior to obligating or expending WIOA Title I funds.

#### Administration

All requests for ITA funding must be supported in the WIOA Title I participant's IEP. Contact and review of program activities and goals regularly with the participant is required. All participants are ~~also~~ required to complete ~~performance~~ reviews with GRWDB staff~~their case manager~~ on a monthly quarterly/semester/module basis in accordance with the timeframes outlined on the IEP. ITA funding is authorized on a ~~semester/quarterly/module~~ basis consistent with the payment plans agreed upon with the training provider, when applicable, 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 and at the sole discretion of GRWDB staff. Students are expected to maintain no less than a cumulative 2.0 grade point average ~~for the year~~ to continue to receive WIOA Title I funding. Invoices from training providers must be placed in ~~customer participant~~ files with ~~vouchers documentation~~ to substantiate payments. ~~Vouchers Documentation~~ must have all signature lines successfully signed approved prior to payments being made. Payments 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 a GRWDB 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.~~



<b>Title:</b>	Work Experience/Internship Policy	<b>Effective Date:</b>	6/8/2017
<b>Policy #:</b>		<b>Revised Date:</b>	5/21/2025

### Purpose

The purpose of this policy is to establish guidelines for the development and implementation of Work Experiences and/or Internships through the Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and/or Youth programs. These activities present opportunities where an eligible participant will be able to learn employment related skills or qualify for an occupation through demonstration and practice.

### References

- Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128
- 20 CFR 663 and 664
- Virginia Workforce Letter (VWL) No. 19-07, Change 2+
- Fair Labor Standards Act
- 20 CFR 680
- 20 CFR 681.600
- TEGL 19-16
- TEGL 21-16, Change 1

### Policy

It is the policy of the Greater Roanoke Workforce Development Board (GRWDB) to provide the option of Work Experience/Internships to ~~Workforce Innovation and Opportunity Act (WIOA)~~ Title I Adult, Dislocated Worker, and/or Youth program participants, where applicable and beneficial. Work Experiences/Internships are planned, structured learning experiences that take place in a workplace or related location with employer interaction for a limited period of time. Work Experiences/Internships may be paid or unpaid, as appropriate, and may be in the private for-profit sector, the non-profit sector, or the public sector. ~~Labor standards apply in any Work Experience/Internship where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.~~ Funds provided for these activities may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. ~~The GRWDB -WIOA~~ is an Equal Opportunity Employer/Program. ~~and a~~ Auxiliary aids and services are available to individuals with disabilities. ~~and i~~ Interpreters are available upon request to allow program participation in services, such as a Work Experience/Internship.

### Procedure

#### Participant Eligibility

Eligible participants in the WIOA Title I Adult, Dislocated Worker, and/or Youth programs can participate in a Work Experience/Internship activity once an assessment of skills, abilities, and interests has been



~~completed assessed~~ and an Individual Employment Plan (IEP) ~~and Objective Assessment (OA)~~ has been successfully developed. In accordance with the IEP and ~~OA assessment~~, there must be a justified, substantial need for a Work Experience/Internship, and can be provided to offer opportunities for career exploration and/or skill development. Work Experiences/Internships will be combined with comprehensive career and supportive services, as needed.

### Host Eligibility

An eligible host for a Work Experience/Internship must meet the following criteria:

- May be in the public, private non-profit, or private sector.
- Must have adequate personnel to provide enough supervision and training for the Work Experience/Internship participants.
- Must provide, to the ~~Work Experience/Internship~~ participants, working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
- Must not use assignments to displace regular employees, or to replace any employee on layoff.
- Must provide an opportunity for the WIOA Title I participant to gain experience and/or skills that lead to occupations identified as ~~in high-demand in the labor market~~ and determined to be of priority in the ~~region's GRWDB's~~ Local Plan.

Staff may request a waiver for participants that are interested in opportunities outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by the GRWDB Executive Director or their designee 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 GRWDB policy) for the occupation connected to the training.

Work Experiences/Internships may not be provided within a Virginia Career Works Center (~~American Job Center~~)- unless approval from the Executive Director of the GRWDB has been received in writing ~~PRIOR~~ prior to the start date of the Work Experience/Internship.

~~Staff may request a waiver for participants that are interested in opportunities outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by a GRWDB 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 a GRWDB 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.).~~

### Work Experience/Internship Implementation

Because the Work Experience/Internship activity is considered a pre-vocational service, the relationship between the WIOA Title I participant and the host for the Work Experience activity does not constitute an employer/employee relationship. A review of the host will ensure that there is currently or expected to ~~have-be~~ enough work to provide the service for the participant. An on-site or virtual visit by staff ~~may will~~ be conducted to ensure that the host has the necessary equipment, materials, and supervision to host the Work Experience/Internship participant.

Payments to WIOA Title I participants that are participating in Work Experience/Internship opportunities are stipends provided for progress and attendance in an intensive service, not compensation for work performed for an employer. Payments to participants for classroom-based training, such as high school equivalency training, are only allowable if tied to a work experience. An educational component such as a high school equivalency program with no ties to a work experience activity is not an allowable cost. All WIOA Title I participants that participate in a Work Experience/Internship opportunity will be provided a 1099 MISC by January 31st documenting the prior calendar year stipends received. All WIOA Title I participants will receive information on requirements to file income taxes and resources to assist them with filing at little to no cost, if applicable.

A Work Experience/Internship agreement will be completed between the host site, WIOA Title I participant, and the GRWDB. This agreement must be limited to the period required for a participant to complete career exploration activities and/or become proficient in the skills that have been identified in the IEP ~~and OA~~ that are needed for job development. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the job, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP. Work Experiences/Internships must include an academic component of some nature related to the industry of placement, whether that be to learn work readiness, a specific skill, update or increase math skills, etc. This must be documented within the Work Experience/Internship agreement and must be completed either prior to or during the Work Experience/Internship.

Prior to the development of the Work Experience/Internship agreement, ~~the host will provide~~ a job description will be provided for the ~~Work Experience/Internship~~ opportunity and a concise outline of the ~~Work Experience/Internship to be given~~, tasks to be learned, and the approximate hours of training required for each task. If this is not formally available, ~~WIOA Title I~~ GRWDB staff will work with the

host to develop the outline and assign hours for Work Experience/Internship. Once this is completed, ~~the WIOA Title I GRWDB staff~~ Staff will determine the length of the training period that will be covered by the agreement. Work Experience/Internship participants will be paid a stipend at a rate of \$15 per hour that the participant successfully attends and participates in the Work Experience/Internship. A Work Experience/Internship may not last longer than 8 weeks nor exceed \$4,800 in stipends, whichever comes first. Funds allocated to a participant for a Work Experience/Internship will count towards the maximum expenditure per participant of \$5,000 per year. Waivers to the time maximums outlined here may be authorized on a case-by-case basis by the Executive Director or their designee, if requested ~~and~~ approved in advance of exceeding these limitations.

Timesheets shall be submitted to the ~~WIOA Title I GRWDB staff~~ on a biweekly basis documenting the hours that the participant attended the Work Experience/Internship. This timesheet must be signed by the participant and the Work Experience/Internship supervisor. ~~WIOA Title I GRWDB~~ staff will also contact the participant at least once a month to ensure that if additional career services and/or supportive services are needed, ~~that~~ they are provided to the participant to ensure successful completion of the Work Experience/Internship activity. This will also be an opportunity for ~~the WIOA Title I GRWDB~~ staff to update the IEP and assess the participant for additional needs/services.

#### Summer Work Experience Bootcamp Opportunities

Special summer work experience opportunities, built around the summer break of school schedules, that are organized in a bootcamp, ~~week-long~~ format, may be available to eligible participants during the traditional May through September period. These summer experiences may vary in hours and schedule depending on local program design and the availability of hosts. Generally, these are operated in a more condensed manner than other work experience opportunities. Because of the variety and inconsistency in scheduling during the summer months, participants in a summer work experience boot camp may not be paid an hourly stipend, as outlined above. However, ~~should they not receive the hourly stipend, they will receive an incentive upon successful completion of the boot camp in the amount of \$100.~~

#### Funding Priorities

While ~~both the WIOA Title I Adult and the WIOA Title I Youth~~ all WIOA Title I programs may provide Work Experience/Internship opportunities for enrolled participants, there is a requirement in federal law that a minimum of 20% of WIOA Title I Youth program year funds must be spent on Work Experience/Internship opportunities and associated activities. Activities and expenditures that can count toward the calculation of Work Experience/Internship expenditures includes the following:

- Payments provided for participation in a Work Experience/Internship
- Staff time working to identify and develop a Work Experience/Internship opportunity, including staff time spent working with employers to identify and develop the opportunity.
- Staff time working with employers to ensure a successful Work Experience/Internship, including staff time spent managing the opportunity.
- Staff time spent evaluating the Work Experience/Internship
- Participant Work Experience/Internship orientation sessions

- Employer Work Experience/Internship orientation sessions
- Classroom training or the required academic component directly related to the Work Experience/Internship
- Incentive payments directly tied to the completion of the Work Experience/Internship
- Employability skills/job readiness training to prepare WIOA Title I Youth for Work Experience/Internship opportunities.
- Supportive service expenses needed for a WIOA Title I Participant to participate in or complete a Work Experience/Internship

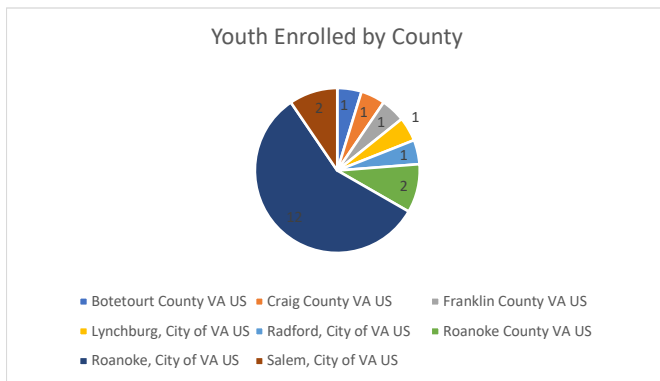
**Workforce Innovation and Opportunity Act (WIOA)**  
**Title I Youth Program**  
*Performance Report*

Participants by Month		
Month	New	Total YTD
July	1	1
August	4	5
September	1	6
October	1	7
November	0	7
December	3	10
January	3	13
February	2	14
March	6	20
April	1	21
May		21
June		21

Carryover Participants	33
New Enrollment Goal	67
Total Participant Goal	100

% Toward New Enrollment Goal	31%
------------------------------	-----

*\*end of month should be 83%*



### Youth Program

Training Participation	
Healthcare	2
Manufacturing	0
Information Technology	0
Financial Services	0
Construction	14
Transportation	0
Education	0
Hospitality	2

Post-Secondary	0
OJT Placements	2
Work Experiences	16

#### Out of School Youth Program Expenditures

Line Item	Budget	Actual Expenditures	Obligations	Actual + Obligated % of Budget
Tutoring, Study Skills	\$0.00	\$0.00	\$0.00	0%
Alternative Secondary School Service	\$0.00	\$0.00	\$0.00	0%
Work Experience/Internship	\$110,000.00	\$30,222.26	\$30,222.26	27%
Occupational Skills Training	\$0.00	\$0.00	\$0.00	0%
Supportive Service	\$50,000.00	\$3,444.91	\$8,998.98	18%
Adult Mentoring	\$0.00	\$0.00	\$0.00	0%
Follow-up Services	\$0.00	\$0.00	\$0.00	0%
Leadership Development	\$5,000.00	\$0.00	\$0.00	0%
Comprehensive Guidance & Counseling	\$0.00	\$0.00	\$0.00	0%
Financial Literacy	\$0.00	\$0.00	\$0.00	0%
Entrepreneurial Skills Training	\$5,000.00	\$0.00	\$0.00	0%
Career Awareness & Career Counseling	\$0.00	\$0.00	\$0.00	0%
Other Youth Services	\$15,000.00	\$750.00	\$750.00	0%
<b>Total</b>	<b>\$185,000.00</b>	<b>\$34,417.17</b>	<b>\$39,971.24</b>	<b>22%</b>

\*end of month should be 83%

#### In School Youth Program Expenditures

Line Item	Budget	Actual Expenditures	Obligations	Actual + Obligated % of Budget
Tutoring, Study Skills	\$0.00	\$0.00	\$0.00	0%
Alternative Secondary School Service	\$0.00	\$0.00	\$0.00	0%
Work Experience/Internship	\$0.00	\$0.00	\$0.00	0%
Occupational Skills Training	\$0.00	\$0.00	\$0.00	0%
Supportive Service	\$0.00	\$0.00	\$0.00	0%
Adult Mentoring	\$0.00	\$0.00	\$0.00	0%
Follow-up Services	\$0.00	\$0.00	\$0.00	0%
Leadership Development	\$0.00	\$0.00	\$0.00	0%
Comprehensive Guidance & Counseling	\$0.00	\$0.00	\$0.00	0%
Financial Literacy	\$0.00	\$0.00	\$0.00	0%
Entrepreneurial Skills Training	\$0.00	\$0.00	\$0.00	0%
Career Awareness & Career Counseling	\$0.00	\$0.00	\$0.00	0%
Preparation for Post-Secondary	\$0.00	\$0.00	\$0.00	0%
<b>Total</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>0%</b>

\*end of month should be 83%

Workforce Innovation and Opportunity Act (WIOA)

Title I Adult and Dislocated Worker Programs

Apr-25

**Adult Program  
Participants by Month**

Month	New	Total YTD
July	15	15
August	12	27
September	15	42
October	12	54
November	5	59
December	10	69
January	15	84
February	3	87
March	11	98
April	2	100
May		100
June		100

Carryover Participants	87
New Enrollment Goal	100
Total Participant Goal	187

% Toward New Enrollment Goal	100%
------------------------------	------

\*end of month should be 83%

**Dislocated Worker Program  
Participants by Month**

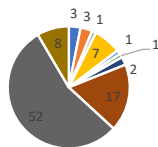
Month	New	Total YTD
July	0	0
August	0	0
September	0	0
October	0	0
November	0	0
December	0	0
January	0	0
February	0	0
March	0	0
April	0	0
May		0
June		0

Carryover Participants	6
New Enrollment Goal	60
Total Participant Goal	66

% Toward New Enrollment Goal	0%
------------------------------	----

\*end of month should be 83%

**Adults Enrolled by County**



- Bedford County VA US
- Botetourt County VA US
- Craig County VA US
- Franklin County VA US
- Lynchburg, City of VA US
- Montgomery County VA US
- Radford, City of VA US
- Roanoke, City of VA US
- Roanoke, City of VA US
- Salem, City of VA US

N/A - none enrolled this Program Year

**Adult Program**

**Dislocated Worker Program**

Training Participation	
Healthcare	62
Manufacturing	17
Information Technology	1
Financial Services	0
Construction	9
Transportation	25
Education	1
Culinary	1

Training Participation	
Healthcare	7
Manufacturing	0
Information Technology	0
Financial Services	0
Construction	0
Transportation	0
Education	0

Post-Secondary	100
OJT Placements	16
Work Experiences	0

Post-Secondary	6
OJT Placements	1
Work Experiences	0

**Adult Program Expenditures & Obligations YTD**

Line Item	Budget	Actual Expenditures	Obligations	Actual + Obligated % of Budget
Occupational Skills Training	\$162,000.00	\$66,434.00	\$75,434.00	47%
On-the-Job Training	\$55,000.00	\$108,207.11	\$120,966.76	220%
Work Experience	\$0.00	\$0.00	\$0.00	0%
Customized Training	\$0.00	\$0.00	\$0.00	0%
Contract Training	\$0.00	\$780.00	\$780.00	0%
Transitional Jobs	\$0.00	\$0.00	\$0.00	0%
Registered Apprenticeship	\$0.00	\$0.00	\$0.00	0%
Incumbent Worker Training	\$0.00	\$0.00	\$0.00	0%
Pre-Vocational Services	\$0.00	\$0.00	\$0.00	0%
Supportive Services	\$0.00	\$16,876.58	\$18,659.40	0%
Certification & Credentialing	\$10,000.00	\$479.00	\$479.00	5%
Other Services	\$10,000.00	\$1,000.00	\$1,000.00	0%
<b>Total</b>	<b>\$237,000.00</b>	<b>\$193,776.69</b>	<b>\$217,319.16</b>	<b>92%</b>

\*end of month should be 83%

**Dislocated Worker Expenditures & Obligations YTD**

Line Item	Budget	Actual Expenditures	Obligations	Actual + Obligated % of Budget
Occupational Skills Training	\$5,000.00	\$0.00	\$0.00	0%
On-the-Job Training	\$10,000.00	\$0.00	\$4,031.94	40%
Work Experience	\$0.00	\$0.00	\$0.00	0%
Customized Training	\$0.00	\$0.00	\$0.00	0%
Contract Training	\$0.00	\$0.00	\$0.00	0%
Transitional Jobs	\$0.00	\$0.00	\$0.00	0%
Registered Apprenticeship	\$0.00	\$0.00	\$0.00	0%
Incumbent Worker Training	\$0.00	\$0.00	\$0.00	0%
Pre-Vocational Services	\$0.00	\$0.00	\$0.00	0%
Supportive Services	\$0.00	\$0.00	\$0.00	0%
Certification & Credentialing	\$0.00	\$0.00	\$0.00	0%
Other Services	\$0.00	\$0.00	\$150.00	0%
<b>Total</b>	<b>\$15,000.00</b>	<b>\$0.00</b>	<b>\$4,181.94</b>	<b>28%</b>

\*end of month should be 83%



# STRATEGIC PLAN

GREATER ROANOKE WORKFORCE DEVELOPMENT BOARD  
JULY 2024 – JUNE 2028

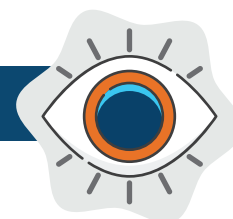
## MISSION

We serve as the Greater Roanoke Region's talent resource, convener, and coordinator using data-driven and strategic workforce solutions to provide trained and skilled job seekers that meet current and future business demand.

## VISION

The region will have both a skilled and diverse talent pipeline for businesses and employment opportunities that provide self-sufficient wages that promote all-around success for the Roanoke Valley and Alleghany Highlands.

## 1. INCREASE OVERALL AWARENESS & UNDERSTANDING



### GOAL

Develop and implement a robust communication plan targeted to each stakeholder group (Board, Job seekers, Partners, Schools, Businesses), to increase overall awareness of GRWDB mission, programs, and outcomes by 5%/year, as measured by an annual survey of stakeholders.

### STRATEGIES

1.1 **Streamline messaging** to create consensus and understanding of the organization's role and mission.

#### Tactics

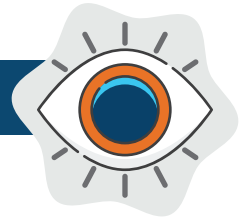
- 1.1.1 Work with qualified firm to develop consistent message on organization's role and mission as part of a comprehensive communication plan.
- 1.1.2 Develop messaging guidelines for staff to deliver to different audiences (i.e. job seekers, businesses, partners, schools, etc.) including consistent core message on mission.
- 1.1.3 Train staff on messaging to ensure understanding.
- 1.1.4 Conduct training for workforce system staff.

1.2 **Identify annual performance metrics** and regularly report to stakeholders.

#### Tactics

- 1.2.1 Use GRWDB and CLEO input to develop annual performance dashboard.
- 1.2.2 Report performance dashboard at each quarterly meeting.

# 1. INCREASE OVERALL AWARENESS & UNDERSTANDING



## GOAL

Develop and implement a robust communication plan targeted to each stakeholder group (Board, Job seekers, Partners, Schools, Businesses), to increase overall awareness of GRWDB mission, programs, and outcomes by 5%/year, as measured by an annual survey of stakeholders.

## STRATEGIES

**1.3 Create platforms of regularly scheduled and customized communications** directed at target audiences (job seekers, schools/youth, employers, board) i.e. newsletters, social media, events, etc.

### Tactics

- 1.3.1 Work with qualified firm to develop a comprehensive communication plan directed at external audiences including social media strategy, direct communication, external stakeholder engagement, news/media engagement (i.e. opinion pieces, news releases, etc.), and event participation.
- 1.3.2 Build and implement a communication plan for advocacy to local and state lawmakers.
- 1.3.3 Survey partners and stakeholder groups separately to identify and prioritize key data to be provided on a regular basis.
- 1.3.4 Develop quarterly labor market information distributed through email, social media, and website.
- 1.3.5 Deliver monthly "newsletter" to Board and CLEO members on GRWDB activities and updates.

**1.4 Maintain** an updated website.

### Tactics

- 1.4.1 Contract with vendor to renovate the website.
- 1.4.2 Develop a plan and staff guide for updating website including a monthly checklist of items that should be reviewed and revised
- 1.4.3 Develop a scribe/training guide for staff to update.

**1.5 Create and regularly update a data dashboard** to include market trends and GRWDB metrics.

### Tactics

- 1.5.1 Develop data dashboard on updated website including items from quarterly labor market update and established performance metrics.
- 1.5.2 Evaluate website traffic to data dashboard to ensure usage.

**1.6 Regularly collect stakeholder feedback** to assess success of efforts.

### Tactics

- 1.6.1 Survey stakeholders annually (job seekers, businesses, partners, schools) to assess overall awareness of GRWDB mission, programs, and outcomes.
- 1.6.2 Report to GRWDB and CLEO at September annual meeting.

## 2. CREATE OPERATIONAL SUSTAINABILITY



### GOAL

Proactively work to expand support for the Mission of the GRWDB as evidenced by execution of these strategies.

### STRATEGIES

**2.1 Develop targeted and sustained advocacy efforts** through the GRWDB, State association, and affiliated groups such as VEDA to key local and state lawmakers to educate and create awareness of impact of services and make specific needs/requests.

#### Tactics

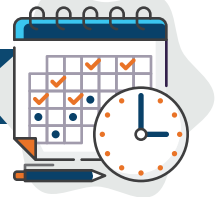
- 2.1.1 Continue to be a part of the Virginia Workforce Association and advocate for partnership with the Virginia Economic Developers Association (VEDA).
- 2.1.2 Create an annual workforce legislative platform.
- 2.1.3 Set regular annual schedule, in line with communication plan, for advocacy and meetings with local and state lawmakers.
- 2.1.4 Make annual presentations to City Councils and Boards of Supervisors.
- 2.1.5 Schedule meetings with General Assembly members and staffers, U.S. House Congressional members and staffers, etc.
- 2.1.6 Contract with vendor to provide messaging training on how to effectively advocate with stakeholders.

**2.2 Develop alternative funding sources** to bring in an additional **\$500K/year** by 2028 and set goals for each (Grants, fee for service, capital campaign, local government funding, other).

#### Tactics

- 2.2.1 Secure funding from all eight localities using methodology and amounts approved by CLEO Consortium.
- 2.2.2 Hire consultant to advise staff on capital campaign prospects, fundraising strategies, fee for service, etc.
- 2.2.3 Explore AmeriCorps VISTA position for grant-writing and capacity building.
- 2.2.4 Research and apply for federal, state, and other discretionary funding to support GRWDB mission and target programs.

### 3. IMPROVE OPERATIONAL EFFICIENCIES



#### GOAL

Identify and remove constraints and create efficiencies to increase staff capacity to develop programs and services that reflect current and future workforce needs.

#### STRATEGIES

##### 3.1 Identify program assets across partner community.

###### Tactics

- 3.1.1 Convene partner roundtable to discuss programs and gaps in region.
- 3.1.2 Produce program asset map showing partner assets and programs as well as gaps in service delivery.
- 3.1.3 Update program map annually.

##### 3.2 Identify and reduce redundant services as identified in program mapping.

###### Tactics

- 3.2.1 Produce report to partner agencies to show results of mapping activity.
- 3.2.2 Present program asset map to GRWDB and CLEO Consortium to identify opportunity to reduce redundant services or inform partners of opportunities to reduce duplication.
- 3.2.3 Present program asset map to City Councils and Board of Supervisors to inform of assets and gaps in the region.

##### 3.3 Automate functions and make use of AI.

###### Tactics

- 3.3.1 Conduct internal analysis on processes that could be automated within the organization.
- 3.3.2 Research best practices of AI implementation within local workforce boards and small non-profits across U.S.

## 4. BUILD PARTNERSHIPS



### GOAL

Strengthen and enhance connections to partner organizations by building a platform of shared learning that creates mutual channels of communication, understanding, and engagement.

### STRATEGIES

**4.1 Implement a regularly scheduled and targeted communications program to partners** that reinforces mission, shares information that supports effective programming, moves toward consolidation of resources, reduces redundancies, and demonstrates results.

#### Tactics

- 4.1.1 Implement strategies set forth in communication plan with partners and stakeholders.
- 4.1.2 Provide asset mapping results to partner entities and post program asset map for easy access at all times for partners.
- 4.1.3 Utilize ATLAS system to provide regular updates to partners on events, “hot jobs,” and to house virtual “resource guide” for partner use.

**4.2 Recognize rural needs** by involving rural constituents and policy makers in a meaningful way.

#### Tactics

- 4.2.1 Join community groups and other public bodies in rural localities to continue engagement and communication.
- 4.2.2 Engage in regular discussions with rural leadership to create a path of communication for unique needs and ideas.
- 4.2.3 Incorporate feedback in GRWDB program planning.
- 4.2.4 Encourage participation of rural CLEO members in CLEO Consortium.

**4.3 Initiate regular individual conversations** with economic development partners.

#### Tactics

- 4.3.1 Establish a quarterly meeting with each local economic development partner.

**4.4 Regularly connect with all partners**

#### Tactics

- 4.4.1 Survey stakeholders annually (job seekers, businesses, partners, schools) to assess overall awareness of GRWDB mission, programs, outcomes, and needs or opportunities.

**4.5 Identify and cultivate relationships** with partners that serve out-of-work populations

#### Tactics

- 4.5.1 Identify partners who serve out-of-work populations. Assess opportunities/initiatives that WDB could support/complement semi-annually.
- 4.5.2 Convene regular meetings of partners to connect key out-of-work populations with workforce ecosystem.
- 4.5.3 Convene regular meetings with key community stakeholders and influencers to understand ongoing events, community efforts, new initiatives, etc.

## 5. FOCUS ON INNOVATION



### GOAL

Identify and pursue new paths to workforce development

### STRATEGIES

**5.1 Implement robust Career Pathway tool** that is usable by all employers to inform regional industry needs and opportunities.

#### Tactics

- 5.1.1 Develop career pathways mapping exercise for use with individual employers to assist in mapping career pathways.
- 5.1.2 Develop template for career pathway mapping that is easily understood and can be used in multiple industries.
- 5.1.3 Develop broad industry pathways that can be used to introduce industry opportunities in the region.
- 5.1.4 Revamp Career Quest to ensure efficiency and effectiveness with both middle school and high school students.

**5.2 Implement robust Sector Strategy Model** with business partners and stakeholders.

#### Tactics

- 5.2.1 Develop sector strategies toolkit (modeled after NRMWDB) to use as training tool for partners and sector strategy stakeholders.
- 5.2.2 Train chambers of commerce, economic development, and other business-facing stakeholders on sector strategy model
- 5.2.3 Partner with above entities to create and implement sector strategies (using TPM Model from U.S. Chamber of Commerce) in:
  - Manufacturing
  - Infrastructure
  - Healthcare
- 5.2.4 Create and implement annual demand survey produced from each sector strategy.

**5.3 Study the jobs, skills and demands of the future workforce**

#### Tactics

- 5.3.1 Engage a consultant to research and collect relevant (and current) reports, research, and data for use by GRWDB in program development concepts including topics such as: generational workforce trends, soft skills best practices, employer and private sector investment in innovative training (external OR in-house) programs.
- 5.3.2 Engage an expert to produce template for state of the workforce annual report

**5.4 Identify new program concepts** to meet the needs of the future workforce

#### Tactics

- 5.4.1 Implement quarterly survey to employer stakeholders to gauge current needs, experiences, and demand for innovative program concepts.
- 5.4.2 Share new or innovative programs concepts being implemented by partner agencies, other LWDBs across Virginia (or other states), state programs, etc. at quarterly Board meetings.
- 5.4.3 Develop and implement, with potential grant support, Educator Workforce Academy to engage teachers, guidance counselors, and other administration from K-12 in learning about career pathways and the future workforce.