



**Policy Memorandum 2020-07**

**Occupational Training Services – Effective October 1, 2019**

**INTENDED AUDIENCE:** AAWDC staff who are involved in the management and approval of occupational training services available to participants through AAWDC initiatives.

**SUBJECT:** Providing Certain Training Services to Participants in Workforce Development Initiatives Operated by AAWDC

**RESPONSIBLE OFFICE:** Job Seeker Services

**POLICY CONTACT:** Vice President of Job Seeker Services

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**CANCELLATIONS**

2013-05 – Pell Grant Policy


**STANDARD OPERATING PROCEDURES**

Individual Training Accounts (ITAs)  
Cohort Training  
Exam Retake

**FORMS**

None

Approvals

 President and CEO, AAWDC

## *Introduction*

The workforce development initiatives operated by the Anne Arundel Workforce Development Corporation (AAWDC) seek to help both job seekers and businesses. These initiatives address the needs of jobseekers by providing individual career coaching, removing employment barriers and connecting them to up-to-date skills and certifications through occupational training opportunities. The initiatives also partner with businesses to provide customized solutions to help them build, attract, retain, and upskill the needed workforce to be competitive in the global economy.

The Anne Arundel County Local Workforce Development Board oversees the workforce development system in Anne Arundel County. As such, the Local Board has implemented a client-centric approach in providing service to participants. The approach involves meeting participants where they are to start, advance, or transition in a career path, addressing their barriers to employment and ensuring that they have essential workplace skills and industry certifications to meet their full career potential. The Local Board recommends a variety of approaches to skills enhancement to include occupational training, work and learn models, apprenticeship, incumbent worker and customized training, essential workplace skills training, and contextualized training.

## *Policy Statement*

AAWDC will provide training to qualified participants who meet the requirements for training services as enumerated in this policy. At all times, it is understood by staff and participants that training services are not an entitlement and are subject to funding limits, the availability of such funding, and any special grant requirements that apply.

### Eligibility Standards

Eligibility for training services is determined on an initiative-by-initiative basis. However, in general, training services are available to all Adult and Dislocated Services, as well as certain Youth categories. Please refer to any grant-specific guidance for more details.

AAWDC utilizes the standards enumerated in the U.S. Department of Labor's Training and Employment Guidance Letter (TEGL) 19-16 that a participant must meet to access training services. There standards are:

1. It must be determined that participant is unlikely to obtain/retain employment through career services alone. Employment should lead to a family-sustaining wage or comparable wages to prior employment.
2. The participant will be able to obtain/retain employment through participation in some form of training. For more information, please see the Determination of Need section below.
3. Additionally, the participant must be able to succeed at the training. This means that he/she has the necessary pre-requisite knowledge and skills, and that barrier mitigation and removal services will allow the participant to attend training.
4. The training must be in an area of need in the region. Need may be demonstrated through identification of the occupation or industry in the array of high-growth industries and occupations in the local area or through coordination with an employer who can provide a bona fide job offer to the participant. The current high-growth industries are published in the Local Plan.
5. The participant must coordinate funding for training with other sources as described below.
6. The participant must meet any service priority guidelines that are in effect for the funding source. Please see your initiative's priority of service guidelines for more information.

### Determining the Need for Training

A participant may receive training services at any point during participation, provided the participant has met the minimum requirements for assessment and documentation of need. However, **training is not an entitlement nor a right**. Training is subject to limits and the availability of funds.

AAWDC requires that case managers conduct an interview, evaluation, or assessment and conduct the necessary career planning to demonstrate a need for training. When making a determination, case managers should consider the following:

- Job readiness assessment
- Employment and training needs



- Financial, social, and supportive service needs
- Labor market demand
- Potential for successful completion (based on a review of minimum qualifications and pre-requisite knowledge/skills/abilities (KSAs) for the selected training program)

While many of these are objectively clear, case managers are expected to exercise their own judgement in many cases.

#### Coordination of Funds

20 CFR 680.230 states that workforce development training funds must be coordinated with other sources of funding, including the participant's own funds. This includes, but is not limited to, training funds available through:

- Temporary Cash Assistance (TCA)
- Supplemental Nutrition Assistance Program (SNAP)
- Title IV programs, such as Pell grants or Federal Work-Study
- State or local educational grants

These funds must be utilized prior to the expenditure of training funds. Participants may select training programs that exceed the maximum amount available for training when other sources of funds are available to supplement.

#### Means Testing

In addition to coordinating funding sources to reduce the burden on an initiative's training funds, AAWDC reserves the right to utilize means testing on an initiative-by-initiative basis. Means testing is a determination of whether a participant is eligible for training services based upon whether the participant possesses the means to do without the help. Generally, means testing will take the form of cost sharing between AAWDC and the participant.

AAWDC will utilize priority of service determinations, in situations where means testing is to be conducted. For more information on Priority of Service, please see the *Adult and Dislocated Worker Priority of Service* policy. AAWDC shall fund training services at the following levels:

- *First and Second Priority* – up to 100% of qualifying training costs
- *Third Priority* – up to 80% of qualifying training costs
- *Fourth Priority* – up to 70% of qualifying training costs
- *Fifth Priority* – up to 50% of qualifying training costs

A qualifying training cost is defined as tuition, books, and other fees (such as labs or tests) that are necessary for the successful completion of the training.

In all situations, it is highly recommended that a participant contributes monetarily to his/her own training. Such contributions have been shown to increase participant buy-in and motivations to successfully complete training. It also demonstrates a desire for training from the participant.

#### Eligible Training Provider List (ETPL)

The Maryland Department of Labor maintains a list of training providers. This list is intended to demonstrate training programs meet certain standards for accountability, quality, and labor market relevance. However, the Local Board has determined that there is a lack of adequate training providers in the local area. Therefore, it is determined that the Local Board will maintain a supplemental list of providers and programs. Initiatives must utilize a program and provider on either the ETPL or the supplemental list.

AAWDC, as the Local Board's administrative and fiscal entity, has established the following requirements for programs to be included on the supplementary training provider list:

- The program must be related to an in-demand industry or occupation and must lead to an industry-recognized certification or licensure.
- The program must demonstrate a program completion rate of 75% or greater.

- The program must demonstrate a credential attainment rate of 60% or greater.
- The provider must be in good standing and cannot be federally debarred.
- If a provider and/or program is removed from the ETPL, the provider and/or program is not eligible for inclusion on the supplemental training provider list for a period of two years.

AAWDC will monitor the program on the supplemental list and make recommendations for removal or continued inclusion on the supplemental list. AAWDC may, at its sole discretion, make an exception for unique training programs so long as the training provider is in good standing and is not federally debarred. This exception may be utilized no more than twice per training program. After that point, a training program becomes subject to the requirements of the supplemental training provider list as enumerated above.

#### Informed Customer Choice

Occupational training services must be provided in a manner that maximizes informed consumer choice in selecting an eligible training service provider in accordance with the goal and objectives outlined in the participant's individual employment plan (IEP). Case management staff may assist the customer with career choices. However, the ultimate decision rests with the participant. Participants cannot be required to attend an upcoming cohort training simply for the convenience of staff.

#### Occupational Testing

Often an occupational certification or credential can only be gained through the passage of an exam. AAWDC will pay for a participant to sit for an exam as a training expense. The participant must sit for the exam within 30 days (or the next available exam, if there are no seats within the 30-day window). Should the participant not meet this requirement, AAWDC reserves the right to make the participant pay the cost of the training and/or exam.

AAWDC shall, at its sole discretion, pay for one retake exam for participants who fail to pass an occupational exam. When making a determination, case management staff shall consider:

- Likelihood of success in a retake
- Cost of exam retake
- Participant attitude and characteristics
- Job readiness and employment prospects

Exam retakes should be processed separately as a third-party payment request. For an exam retake, the participant must sit for the exam within 60 days of the first exam. Should the participant not meet this requirement, AAWDC reserves the right to make the participant pay the cost of the exam.

#### ***Definitions***

*Occupational skills training* – An organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational field at the entry, intermediate, and advanced levels. Traditionally, such programs are outcome-oriented, at least 3 days in length, and lead to the attainment of a recognized industry credential.

*Pre-apprenticeship* – A program or set of services designed to prepare individuals to enter and succeed in a Registered Apprenticeship program. A pre-apprenticeship program, by definition, has a documented partnership with at least one Registered Apprenticeship program. Pre-apprenticeships help individuals meet the entry requirements for apprenticeship programs and ensure they are prepared to be successful in their apprenticeship.

*Registered Apprenticeship* – An employer-driven occupational training model, apprenticeship programs provide on-the-job learning from an experienced mentor and related classroom instruction on the technical and academic aspects of the job. Registered Apprenticeship is the term used for apprenticeship programs that have a formal structure, in which employers have established learning standards that meet national and state quality expectations. When individuals successfully complete a Registered Apprenticeship program, they receive a national credential that is recognized anywhere in the industry.



*Non-occupational skills training* – Any training intended to provide a participant with generalized vocational skills, such as computer training, or job readiness skills. The skills provided are largely informational or may be applicable across a number of industries or occupational. Examples of non-occupational skills training include Workplace Excellence, Microsoft Office, and OSHA-10.

#### ***Related Policies and Other Resources***

- *Workforce Innovation and Opportunity Act (29 USC 310) Title I*
- *20 CFR 680 Subpart B* – Training Services, Adult and Dislocated Worker Activities Under Title I
- *TEGL 19-16* – Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service, as amended by title III of WIOA, and for Implementation of the WIOA Final Rules, dated March 1, 2017
- *Policy Issuance 2017-09* – WIOA Title I Training & Maryland's Eligible Training Provider List, dated October 26, 2017
- *Policy Memorandum 2018-01* – WIOA Adult and Dislocated Worker Priority of Service, dated August 1, 2017