

 Maricopa County Workforce Development Division	SECTION/REFERENCE DES Section 500 Training Services; WIOA Final Rule 680.200 - 300	POLICY NUMBER WDB 24-04
	ORIGINAL ISSUE DATE November 2024	REVISION DATE December 2024
	AUTHORIZED BY: Maricopa County Workforce Development Board	
SUBJECT: Eligibility, Prioritization & Approval of Training Services Policy		

Purpose: To outline the process and requirements for the approval of Training Services for Adult, Youth and Dislocated Workers using WIOA Title 1B funding.

Responsibility of: Program Supervisors and Career Advisors (CAs)

Definition: Occupational Skills Training (OST) is an organized program of study providing specific vocational skills that lead to a proficiency in the performance of actual tasks and technical functions required by certain occupational fields at entry, intermediate or advanced levels.

Description: This policy outlines eligibility requirements for adults, youth and dislocated workers seeking training services to prepare them for in-demand industries and occupations in the local labor market as identified by Maricopa County’s Local Workforce Development Board (LWDB). ARIZONA@WORK Maricopa County will give priority to training that results in employer- and industry-recognized credentials that align with the LWDB targeted industry sectors. Through occupational skills training, individuals will acquire skills needed to obtain or retain employment, increase earnings, and become self-sufficient.

Maricopa County’s Workforce Development Board reserves the right to implement specific funding limits to Individual Training Accounts (ITA). Maricopa County’s Workforce Development Board has determined that WIOA training funds for the Adult, Dislocated Worker and Youth program participants will be limited to training programs in the following industry sectors targeted by the LWDB:

- Construction
- Finance and Insurance
- Healthcare and Social Assistance
- Information
- Manufacturing
- Transportation and Warehousing

Career Advisors will identify participants who would benefit from training services to obtain or retain employment. The CA may request the participant to complete job readiness activities,

assessments, career exploration and program research as deemed appropriate. The Priority of Service policy will be applied when reviewing and approving training services for participants enrolled in the Title 1-B Adult program. Refer to the [Priority of Service](#) policy for priority groups and acceptable documentation.

Participant Eligibility for Training Services

Individuals must be registered in the Arizona Job Connection (AJC) system and be determined eligible for WIOA Title I-B. Individuals seeking youth services, individualized career services and/or financially assisted WIOA services, including but not limited to occupational skills training, work-based training, and support services must be Arizona residents at the time of WIOA application (there is no minimum length of time required for residency).

Adults must be Priority Level 1, 2, or 3 to be eligible for training funding. Individuals who are Priority Level 4 may be considered for training funding on a case by case basis. All participants must receive, at a minimum: An interview, assessments or evaluation, and career planning, including the development of an Individual Employment Plan (IEP) or Individual Service Strategy (ISS). Staff may use a participant's recent interview, assessment, evaluation, or assessment for assessment purposes when such is conducted by another education or training program, as deemed appropriate if it is less than 6 months old.

Note: There is no minimum time period for participation in services prior to the individual becoming eligible for training services.

Training services are available to adults (priority level 1, 2, or 3), youth, and dislocated workers and Priority Level 4 Adults on a case by case basis if staff determines, after an interview, evaluation or assessment, and career planning, that the participant is:

- 1) Unlikely or unable to attain or retain employment that leads to economic self-sufficiency, or wages comparable to or higher than wages from previous employment, through career services;
- 2) In need of training services to obtain or retain employment that leads to economic self-sufficiency, or wages comparable to or higher than wages from previous employment;
- 3) Determined to have the skills and qualifications to successfully participate in training services;
- 4) Selecting a program of training services directly linked to employment opportunities in the local area, the planning region, or another area to which the participant is willing to commute or relocate;
- 5) Unable to obtain grant assistance from other sources to pay for the cost of training or requires WIOA Assistance in addition to other sources of grant assistance; and
- 6) Determined eligible in accordance with the state and Maricopa County Priority of Service policy in effect for adults.

Training Services Prioritization

Due to limited funding, prioritization of training funds for the adult, dislocated worker, and youth programs will be given to those residing in the local area of Maricopa County and Priority 1 participants from other local workforce areas. Individuals from other local workforce areas that are not Priority 1 will be referred to their local area for funding. Exceptions for this can be made on a case-by-case basis to support specific workforce initiatives and industries. If additional funding becomes available consideration may be given to individuals from other local areas who are not Priority 1.

Case File Documentation

Participant case files must include:

- 1) A determination of the need for training services as determined by interview, assessment, or evaluation;
- 2) The Eligibility Determination for Training Services service added to the AJC S&T plan for adults and dislocated workers;
- 3) Career planning documentation, including that the participant was provided or researched labor market information and training provider performance information; and
- 4) Any other basic, career, or design framework services received.

Coordination of WIOA Title I-B Training Funds with Other Grant Assistance and Co-Enrollments

WIOA Title I-B funding for training is limited to participants who are unable to obtain other grant assistance to pay for the cost of training or who require assistance beyond that available from other

sources to pay for such training. Staff must coordinate funding arrangements and co-enrollments with partner programs and other entities. When possible WIOA funds should be used as a last resort.

Staff must ensure that WIOA Title I-B training funds are awarded only when no other sources of funding are available or when the amount available is insufficient to cover the participant's training costs. Staff must document attempts made by the participant to secure other funding sources or the application of alternative sources of funding in AJC case notes. Alternative sources of funding that may be available include, but are not limited to:

- Trade Adjustment Assistance (TAA);
- Rehabilitation Act funds;
- Temporary Assistance for Needy Families;
- Federal Pell Grant funds; or
- Other federal grant funds or training grants.

NOTE: Veterans training grants do not have to be applied to training costs prior to the use of WIOA funds.

Participant Training Agreement

The Participant Training Agreement outlines the participant's responsibilities regarding training. The CA will review the agreement with the participant after the training packet is returned. The CA will have the participant sign the agreement to indicate their understanding and agreement. The original will be placed in the participant file; the participant will be given a copy.

Recommended Activities

The CA will work with the participant to determine what services will enhance the participant's employability. Since not all participants have the same needs or level of employment readiness the CA will review each participant's needs on a case-by-case basis. Participation and progress in Career and/or Training Services will be documented in the participant's IEP/ISS, file, and case notes. Career Services activities may include but are not limited to:

- Resume Instruction and resume critiquing
- Interview Techniques
- Career Exploration
- Assessments
- Employment Academy

These activities can occur concurrently with Training Services and can be substituted if the customer has attended workshops with other agencies/companies within the past six (6) months. CA will document substituting activities in case notes.

WIOA Training Grant Application Staff will provide the participant with a WIOA Grant Application. Participants will complete the required research, forms, and submit the application to their CA. The CA will review the application for thoroughness and completion.

The CA will present the WIOA Grant Application and review the participant's case with the Program Supervisor to determine if the training request will be approved. If the training request is approved the CA will create a Service Authorization in Dynamics. Once the Service Authorization is approved by Finance, the CA will create an Individual Training Account (ITA) Voucher. If the training request is denied, the CA should discuss other training or employment options with the participant.

Individual Training Accounts

Occupational training services for Adults, Youth and Dislocated Workers are typically provided by training providers on the ETPL who receive payment for their services through an Individual Training Account. The ITA is a payment agreement established on behalf of a participant with a training provider. Maricopa County reserves the right to establish dollar limits on ITAs based on the availability of Adult, Dislocated Worker, and Youth program training funds. Refer to the Training Services Limits Policy for more information.

The ITA dollar amount cannot exceed the program costs listed on the ETPL. However, the ITA dollar amount can be **less than** the costs listed on the ETPL if the training provider is

providing a discount or scholarship, Pell Grant is applied, the participant or a partner program is paying a portion of the costs.

If the participant's training request is approved, the CA will inform the participant and prepare and sign the ITA voucher, obtain signatures from the participant, Program Supervisor, and the training provider. Once all required signatures have been obtained on the ITA voucher, a copy of the voucher will be forwarded to the Program Supervisor and to the training provider. The Program Supervisor or designee will record the voucher on the ITA Tracker. The original voucher will remain in the participant file.

NOTE: ITA Vouchers cannot be used to pay for training that is not on the ETPL, unless the training is provided by a community-based organization for individuals with special needs.

Individuals may be attending school when they become a WIOA Title IB participant, however **reimbursement of training costs or payment of past debt to the training provider is not allowed for payments made or debt incurred prior to WIOA Title I-B program participation.** When clients request trainings that are not short term and exceed budget limits, WIOA funds are to be applied at the end of the training program given the students are in good academic standing. Individuals who are currently enrolled in a training program but are requesting WIOA funding to complete the training will be reviewed on a case-by-case basis. Factors to consider in reviewing the request are whether the individual has already completed a significant portion of the training, i.e.:

- they have up to two semesters remaining if they are in a degree program leading to an associate or bachelor's degree or
- have completed 3/4 of a certificate program that results in an industry-recognized credential;
- the individual has experienced a loss of income/support and can no longer afford the training
- they are in an apprenticeship program that recently started but no payments have been made yet

In these cases, the participant must obtain a "training proposal" from the training provider that specifies their training start date, anticipated completion date, dollar amount of program, payments made, and balance due.

Changing Training Providers/Programs

A participant may change the training provider selected only with the approval of the Program Supervisor **prior** to the start of training. The participant will provide the request in writing and include the reasons for the change. If the change is approved, the participant must update their WIOA Training Grant Application with the new information; the CA will update the IEP/ISS as needed. If the change is not approved by the Program Supervisor, the CA will be informed of the reason for non-approval and communicate that to the participant.

Customer Choice

Training services, whether provided through ITA's or contracts, must be provided in a manner that maximizes informed consumer choice in **selecting an eligible training provider**. A participant determined eligible for training services may select a training provider from the Eligible Training Provider List after consultation with a Career Advisor

Occupational Skills Funding

The maximum amount of funding for participant training is established by the Maricopa Workforce Development Board can be referenced in the [Training Services Limits](#) policy.

Active participants may be considered for additional training if it builds on previous training, i.e., stackable credentials or training needed to continue along a career pathway. The total training funding for the year for all training combined shall not exceed the maximum referenced in the Training Services Limits policy. The participant must have successfully completed the training and provided a copy of their credential before additional training can be approved.

Exited participants who were provided WIOA-funded training and are returning requesting additional training must go through the WIOA eligibility process if more than 90 days have lapsed since their last service date and must be determined to need additional training.

A participant may be eligible for additional funding based on the following:

- It has been less than 12 months since participant successfully completed training, gained employment, and the participant can demonstrate that additional training builds upon their previous training providing them a stackable credential that would qualify them for career advancement, or prevent them from being laid off
- The participant can demonstrate that due to a significant economic life or health event, they are no longer able to work in the original occupation they trained for and can demonstrate the ability and motivation to successfully complete a different training program and gain employment
- It has been at least 12 months since the participant was unsuccessful in the training and can demonstrate the ability and motivation to successfully complete a training program