



POLICY: TRAINING SERVICES

EFFECTIVE DATE: NOVEMBER 02, 2022 POLICY NUMBER:6005_PROG_030124_Training Services
REVISION DATE: FEBRUARY 27,2024

RESPONSIBLE PARTIES: Career Advisor, Career Services Manager, Director of Programs, Deputy Director of Workforce Services, Deputy Director of Administration & Finance

PURPOSE: The policy on Training either ITA or Cohort training ensures that every Workforce Innovation and Opportunity Act (WIOA) participant receives quality services. This policy outlines steps to ensure that eligible and suitable job seekers have opportunities for training in vocations from the High Priority Occupations list according to the Montgomery County Workforce Development Board (WDB).

BACKGROUND: WIOA Title-I training services for eligible adults, dislocated workers and youth are provided in one of two ways. Primarily, customers are provided training through Individual Training Accounts (ITAs). Using ITA funds, eligible customers can use funds for training services from eligible training providers they select through WorkSource Montgomery (WSM) Career Advisors, as exhibited in the Maryland Department of Labor's list of eligible service training providers from vetted venues.

Cohort training is another avenue for which WIOA Title-I training services for eligible adults, dislocated workers and youth are provided. Cohort training has proven to be most efficient because training services are negotiated at a discounted group rate with the guarantee of a minimum number of participants. WSM Career Advisors utilize the same criteria as with ITAs to make training selections that fit the customer's Individual Employment Plan, but group together customers with similar training needs.



Participants are expected to utilize information such as skills assessment, labor market information and training providers' performance and take an active role in managing their employment future regardless of training option.

CANCELLATIONS: This policy supersedes all pre-existing policies for ITA and Cohort Training.

ACTION REQUIRED: Within 15 days of the receipt of this policy it is the recipient's responsibility to ensure all staff are informed of the policy and to create an internal process to ensure accountability.

QUESTIONS: Questions relating to this policy should be directed to the Director, Performance & Compliance at policy@worksourcemontgomery.com.

POLICY:

Training Services can be critical to the employment success of participants. Under WIOA, training services may be provided if staff determines after conducting an interview, evaluation, or assessment and career planning, that the individual:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than the wages from previous employment through career services alone;
- Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher wages from previous employment;
- Has the skills and qualifications to successfully participate in the selected program of training services;
- Is unable to obtain grant assistance from other sources to pay the costs of such training, including sources such as state-funded training funds or Federal Pell Grants (20 CFR 680.230 and WIOA sec. 134c(3)(B) containing provisions relating to fund coordination.
- Is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting determination. If the petition is



certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA;

- Is determined eligible in accordance with the State and local priority system in effect for adults under WIOA sec 134c(3)(E) if training services are provided through the adult funding stream; and
- Selected program of training that is directly linked to the employment opportunities in the local area or the planning region.

[\(TEGL 19-16\)](#)

Participants seeking training must apply for financial aid (if appropriate) during their career research and before requesting access to WIOA funds. WorkSource Montgomery American Job Center

(AJC) staff should be assisting customers with the FAFSA process; information is available at www.fafsa.ed.gov. WSM Staff should notify participants that any financial aid received may reduce the funding provided by WorkSource Montgomery, Inc.

Each participant is required to conduct research and prepare a training plan prior to submitting a written request for training funds. The following must be documented in the request:

- The occupations for which the training will prepare the participant;
- The local employment projections for the specific occupation(s);
- The entry level salaries of these positions;
- Evidence that the position is on the High Priority Occupation list;
- A statement regarding how the remaining tuition balance, if any, will be satisfied if the course amount exceeds the allowable funding; and
- For ITAs, a comparison of (2) training providers from the state approved Eligible Training Provider List (ETPL).

Customers seeking training funds must first successfully complete WIOA required assessments prior to eligibility for training. The assessments include the Objective Assessment and the establishment of an Individual Employment Plan (IEP) with their



Career Advisor. Customers must also show aptitude in the field of training and eligibility for the selected training program.

The appropriate Career Advisor will confirm with WorkSource Montgomery's Career Services Manager that the training providers being considered have an existing Memo of Understanding (MOU). If an MOU has not been established, the training provider will prepare an MOU within 48 hours and will forward it to WSM. WSM AJC staff should not refer clients to any school or course until the MOU has been signed.

Once the participant has completed the necessary research and appropriate assessments, the Career Advisor will meet with him/her to review the findings of the research and determine if the proposed training is an effective career and training option/opportunity. The Training Justification Check List must also be reviewed with the participant and attached to the request. The case file must contain a determination of need for training services as identified in the participant's Individual Employment Plan (IEP).

Once the Eligible Trainee has submitted their training plan the following must occur:

- The Career Advisor will verify the items on the training justification check list are complete
- The Career Advisor will submit the following to the Career Services Manager for review:
 - o Acceptance Letter from the training provider including accurate course dates, cost (not to exceed amount listed on ETPL), course title and provider contact information.
 - o Signed (both client and CA) Individual Employment Plan and Objective Assessment
 - o Signed Training Justification
 - o Case Notes evidence of participant's research in Training and courses.



It is important to inform the participant of this process and ensure awareness that training is subject to funding availability and is not guaranteed. Training must be approved prior to start date for WIOA funding. Training approvals cannot be backdated.

- The Career Advisor must verify the client is attending training and will be in communication with the training provider.
- The Career Advisor will be in contact with the client during training and will obtain progress reports and completion.
- All items will be documented in MWE.

COHORT TRAINING:

Just like ITAs, Cohort training typically uses training providers on the state approved ETPL. On occasion, The Local Board may approve the use of a community-based organization that has skills to serve individuals with barriers to employment with a proven track record of success, or contract with an institute of higher education to train multiple individuals in an in-demand industry to serve the needs of employers. In all instances, customers have a choice of using an ITA instead. Either option is dependent upon available funding. Cohort training areas are not as broad as that of ITAs and there needs to be enough customers ready at approximately the same time with similar interests and aptitudes to offer that choice.

CUSTOMIZED TRAINING:

Customized Training is designed to meet the specific requirements of an employer or group of employers with the commitment that the employer(s) hire an individual upon successful completion of training. The Local Workforce Development Board will determine the customized training meets the unique needs of the job seekers and employer(s). The employer will pay a significant portion of the training as determined by the Local WDB. ([TEGL 19-16](#))

ON THE JOB TRAINING: Please see Policy BS_082023_200



FUNDING: The funding for ITAs is a maximum \$5,000 per participant and is subject to the availability of funds. Training funds are available to active WIOA participants, not individuals who have exited services. There is an estimated 24-month waiting period for participants to receive WIOA training once they have exited services. Customers are restricted from re-enrolling into WIOA until 12 months from the completion date of their prior participation follow-up year. At that time, additional training is not guaranteed due to limited funds, and participants who have never received WIOA paid training will have priority.

Cohort training aims for a minimum 25% discount (can vary) compared to individual ITA training. Cohort minimum participation to achieve the discounted rate depends upon the course delivered; it typically ranges from 3-12 participants.

DISCLAIMER: This policy is based on WSM's interpretation of the statute, along with the Workforce Investment and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

