

Department of Community College and Workforce Development	Number: 589-30.6
	Effective Date: January 1, 2002
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SUBJECT: Access to Training for WIA Participants; Issuance of Individual Training Accounts (ITAs)	Approved: 

Purpose This policy provides a methodology for local areas to assure access to WIA training services in a flexible manner to meet the needs of participants, while continuing to maintain maximum customer choice.

Background The WIA requires that "training" be recorded and reported by "program of training services." In Oregon, under stringent state consumer protection laws, public postsecondary programs must be approved by the State Board of Education or State Board of Higher Education; private postsecondary programs must be licensed by the Oregon Department of Education Private Career School Unit or authorized by the Office of Degree Authorization of the Student Assistance Commission. Programs can vary in length from less than one year to post-graduate. While a number of Oregon postsecondary programs were placed on the WIA Statewide List of Eligible Training Providers, this did not address the needs of many WIA participants who needed a group of courses, not a complete program.

Because of the "program of training services" definition, WIA participants were unable to receive training that fell short of a full "program." To address this problem, Oregon developed a policy called the "Design to Accommodate a Continuum of WIA Intensive and Training Services," or the Continuum Policy. This policy stated that within specific parameters, instructional services short of a complete program were considered to be Intensive Services. An environmental scan of local areas and practices found that the Continuum Policy was used extensively. However, as use of the policy proceeded, more problems emerged since shorter-term training was reported as Intensive Services rather than as Training Services under the WIA. This meant that few ITAs were provided to participants and few training dollars were being expended since most coursework was considered as intensive, not training services.

While the original Continuum Policy may have provided participants with the instruction needed for positive employment outcomes, there was negative scrutiny of the Continuum Policy by the U.S. Department of Labor, who believe that the Continuum understated training services and undermined the principle of customer choice.

A local and state task force, known as the ETP Work Group, was formed to find solutions to this problem as a part of finishing the development of the ETP system. Part of the charge of the Work Group was to develop alternatives to the Continuum Policy that would provide a flexible solution to the need for certain WIA participants to take courses short of a full program.

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The ETP Work Group investigated the data sources necessary for the tracking of the progress of WIA participants and the performance of training providers. They discovered that participants generally choose to enroll in full programs at private career schools while community college enrollment tended to be for courses short of a complete program. This phenomenon seems to relate to the populations served by the institutions and the manner in which instruction is provided. Even though community college students often do not complete full programs, the community college data system, OCCURS, has the capacity to track student participation and success by individual course within programs. Through OCCURS it is possible to develop a method by which individual student course achievement can be tracked as part of a student training plan/program.

The Work Group found that community college programs currently make up more than 50 percent of the Eligible Training Provider List in Oregon. The community college programs on the ETP list and the capacity to track individual student programs assist the state in providing opportunities for WIA participants. This is especially significant for the rural areas of Oregon, where there are few training providers and the community college may be the only option for training.

One of the effects of this policy is that the original Continuum Policy is no longer needed to provide the flexibility to meet customer needs. However, the Continuum has been revised as a policy paper, which is considered to be a companion to this policy, in order to clearly delineate the line between intensive and training services. Certain of the revisions to the Continuum, and language included in this policy, also have the purpose of maintaining as much of the flexibility as possible that existed under the Continuum for local One-Stop systems to continue to provide good customer service and to promote customer choice.

References Workforce Investment Act of 1998, PL 105-220, Sec. 122 and 134.
 ORS 348.603.
 ORS 345.015.

Definitions

Applicable Program of Training Services

For Oregon's ETP performance measurement purposes, for those measures that apply to WIA participants only, the applicable program of training services is the program of instruction, comprised of a program or eligible courses, determined at assessment for each participant and noted on the Individual Employment Plan (IEP), for which an ITA is issued.

Note: The IEP may include eligible courses, or a program, which must be from the Statewide List of Eligible Training Providers and Programs (Eligible Training Provider List).

Collegiate-Level Work

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Collegiate level work provides skills and information beyond what is normally gained before or during the secondary school level. It is characterized by analysis, synthesis, and applications in which students demonstrate an integration of skills and critical thinking. It is a term that denotes more than college/university transfer courses. It also includes professional technical education and other courses that exceed basic skills, workplace readiness, and fundamental basic skills. Courses must be collegiate level if used to fulfill a requirement in an associate degree, option, or certificate of completion program.

Eligible Courses

Eligible courses are those courses for which an ITA may be issued. The courses must be part of an approved program on the Eligible Training Provider List (ETPL), and be occupational skills courses and/or those courses leading to competencies needed for employment.

Note: Drawing on the courses from programs on the ETPL means that the providers must be state approved, licensed, or authorized education or training institutions.

Program Completer

A WIA participant who, having received an ITA for Training Services, will be considered to have successfully completed a program of training services if that participant:

- Received a career school diploma, certificate of completion, associate degree, or baccalaureate degree;
- Completed all eligible courses enrolled in during WIA participation with a passing grade (pass, D or better); or
- Completed 50 percent of courses enrolled in during WIA participation, with a passing grade (pass, D or better), and became employed by the end of the quarter after the exit quarter.

Note: OCCURS records course completion as a grade. Actual grades students receive cannot be shared outside the system. "A passing grade (D or above)" in effect becomes "pass/fail" for the purposes of these performance measures. Some courses are not given a grade, but are only "pass/fail."

Note: For the purposes of these measures, "50 percent" is defined as 50 percent of a complete program, or 50 percent of courses enrolled in.

Policy

1. ITAs may be issued only for programs on the ETPL, or for eligible courses at an eligible training provider, drawn from programs on the ETPL.
2. If an ITA is issued for eligible courses, the program of study must be noted on the Individual Employment Plan (IEP) in the participant record.

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3. ITAs are to be issued for occupational training services, as defined in WIA 134(d)(4). Non-collegiate-level work is not considered to be training services. Prevocational services are not considered to be training. These services may be part of a participant's IEP but are not eligible to be part of an ITA unless combined with specific occupational skills training. These include:
- Adult education and literacy services or English as a Second Language, unless combined with specific occupational skills training (WIA 134(d)(4)(D)(viii));
 - Basic computer literacy; and
 - Short-term prevocational services, WIA 134 (d)(3)(c)(vi).

Prevocational services are further clarified in the attached policy paper: A Continuum of Intensive and Training Services — Revised.

4. Occupational skills training and/or those programs or courses leading to the competencies needed for employment in a specific occupation or industry are considered to be training services and must be provided through an ITA. However, some instructional services are not considered to be training services under the WIA. These services are further clarified in the attached policy paper: A Continuum of Intensive and Training Services — Revised.
5. It is the policy of the State of Oregon that programs of training shall appear on the ETPL in order for an Individual Training Account to be offered to a participant. However, in exceptional circumstances, it may not be possible to follow the necessary procedures to put a training program on the ETPL. These exceptional circumstances include:
- An element of urgency or exigency exists that would result in the participant's losing the opportunity (e.g., time-limited job is waiting for a client if instruction is completed); and
 - A unique, one-time, non-duplicated set of individual circumstances affects an individual participant; and
 - The training has been researched to assure a reasonable opportunity for completion and that the training is of sufficient quality to meet participant needs; and

In such circumstances, training may be offered to a single participant, through an ITA, for a program not on the ETPL, as long as that training is:

- A program that is state licensed, approved, or authorized; or
- Sponsored or offered by a bona fide trade, business, professional or fraternal organization or by a business solely for the organization's membership or the business's employees or prospective employees, with a bona fide job offer, dependent on the training to be received.

In all cases, justification for such exceptions shall be clearly documented in the Individual Employment Plan. This justification will be a part of the Quality Assurance Review.

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6. Previous issuance, "Design to Accommodate a Continuum of WIA Intensive and Training Services," or the Continuum Policy, dated Dec. 28, 2000, ceases to have the force of policy on December 31, 2001.

Procedure:

Responsibility

Actions:

Subrecipient

Adopts procedures for the referral to training services of WIA adult and dislocated worker participants that meet the requirements and intent of this policy.

CCWD

Reviews for compliance with this policy.

POLICY PAPER: A CONTINUUM OF WIA INTENSIVE & TRAINING SERVICES

REVISED

THE PROBLEM: For a variety of local and statewide reasons, availability of, access to and the alignment of Workforce Investment Act (WIA) intensive and training services have created service delivery problems for certain areas of the state. The lack of clarity of the relationship between intensive and training services and the continuum of service needed by eligible participants has led to misunderstanding and confusion for participants, and for service and training providers.

POLICY: The goal of this policy paper is to clarify how WIA Access to Training policy will expand choices and improve options for WIA and other participants in the One Stop system. The policy paper intends to provide for a seamless continuum of participant services from WIA intensive to training services. The policy paper provides for better clarifying the line between intensive services and training services, while maintaining the flexibility needed to meet participant needs. The policy paper is a companion piece to CCWD policy: *Access to Training for WIA Participants; Issuance of Individual Training Accounts (ITAs)*. The matrix on the next page shows intensive and training services with a continuum of intensive services identified to better meet the needs of participants. Key elements of the new proposal have been outlined on the following pages to clarify the policy and its impacts.

Key Goals and Assumptions:

- Provide services needed by customers
- Maximize capacity and minimize duplication
- Maximize customer choice and access to the system
- Build training capacity for the system
- Continue the implementation of Oregon's system of Eligible Training Providers/Programs
- Provide clear transitions for system
- Close the skill gap
- Align the WIA and state statutes and administrative rules regarding education and training
- Minimize audit exceptions for the system

MATRIX OF INTENSIVE AND TRAINING SERVICES (Alphabetical Order)

SERVICE CATEGORIES	INTENSIVE SERVICES	ADDITIONS/ CLARIFICATIONS TO INTENSIVE SERVICES	TRAINING SERVICES
ASSESSMENT	<ul style="list-style-type: none"> • Comprehensive Assessment • Development of of Individual Employment Plan • Skill and service needs assessments 	<ul style="list-style-type: none"> • Specialized assessment • Diagnostic testing • In depth interviewing and evaluation to identify employment barriers 	
CASE MANAGEMENT	<ul style="list-style-type: none"> • Case management 	<ul style="list-style-type: none"> • Development of individual employment plans 	
COUNSELING	<ul style="list-style-type: none"> • Career planning 	<ul style="list-style-type: none"> • Group counseling • Individualized counseling • Job and Career Counseling 	
JOB SEARCH AND RELOCATION	<ul style="list-style-type: none"> • Out-of area job search • Relocation expenses 		
REFERRALS TO TRAINING (IF APPROPRIATE)			<ul style="list-style-type: none"> • Apprenticeship • Eligible courses as noted on IEP • Occupational Training Program • Workplace and Related Training Program • Entrepreneurial Training Program • Self-Employment • Customized Training • Contracted Training • On-the-Job Training

SERVICE CATEGORIES	INTENSIVE SERVICES	ADDITIONS/ CLARIFICATIONS TO INTENSIVE SERVICES	TRAINING SERVICES
SHORT TERM PREVOCATIONAL SERVICES	<ul style="list-style-type: none"> • Basic workplace readiness • Basic job readiness • Communication skills • Computer literacy skills • Develop. of learning skills • Interviewing skills • Literacy Activities • Personal maintenance skills • Pre-apprenticeship • Professional conduct • Punctuality 	<ul style="list-style-type: none"> • Basic/Intermediate Computer Literacy Skills --See note* • Instruction that is 40 hours or less in length and is considered to be short-term prevocational services – See note** 	
WORK EXPERIENCE	<ul style="list-style-type: none"> • Internships • Work experience 		

NOTES:

*** ADDITIONAL CLARIFICATION OF BASIC/INTERMEDIATE COMPUTER LITERACY INSTRUCTION**

Definition

Computer Literacy Skills -- Basic and intermediate computer manipulation and production skills needed across most occupations for a prospective employee to obtain and maintain unsubsidized employment. For most occupations, computer literacy skills would include keyboarding proficiency as well as basic or intermediate, word processing, spreadsheet, database and internet/web access skills. In most cases computer literacy skills would not include specialized occupational computer skills such as programming, network administration, specialized software application training or other computer skills necessary for a particular occupation or group of occupations.

Rationale

Basic/intermediate computer training—keyboard, word processing, spreadsheet, database, Internet/Web, etc. are considered to be necessary basic skills and will be considered as prevocational services.

The marked increase in the need for computer literacy for most jobs makes basic and intermediate computer literacy skills and knowledge basic skills for current and future job entry for participants. Basic computer instruction will not be considered as training service allowing Title 1B Service Providers to send eligible participants to basic computer classes without an individual training account (ITA) and without the individual courses being on the Statewide ETP List.

Not identifying basic/intermediate computer literacy instruction as training services will provide local latitude for Title 1B Service Providers to utilize state licensed/approved local education and training entities to provide computer literacy skills without being on the State List. While it is expected that the majority of basic/intermediate computer literacy instruction will be provided as intensive services, it is possible for some of this instruction to be provided as core services.

****ADDITIONAL CLARIFICATION OF INSTRUCTION THAT IS 40 HOURS OR LESS IN LENGTH**

Instruction that is 40 hours or less in length and is considered short-term prevocational services may be classified as Intensive Services and does not need to be included on the ETPL. Such short-term prevocational services are meant to be one-time only occurrences and are not to be packaged with other offerings from the same provider which if taken together would exceed the 40 hour maximum.

Applicable Definitions:

Intensive Services: CFR, part 663, subpart B(1) – Intensive services are intended to identify obstacles to employment through a comprehensive assessment or individual employment plan in order to determine specific services needed, such as counseling and career planning, referrals to community services, and, if appropriate, referrals to training. May also include—out-of-area job search, relocation expenses, internships, work experience, skill and service needs assessments, case management and (134 d 3 C vi) short term prevocational services, including development of learning skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training

CFR 663.210. Intensive services must be provided through the One-Stop delivery system, including specialized One-Stop centers. Intensive services may be provided directly by the One-Stop operator or through contracts with services providers, which may include contracts with public, private for profit and private non-profit services providers (including specialized service providers) that are approved by the WIA Local Board

Intensive Services. Section 134 USE OF FUNDS FOR EMPLOYMENT AND TRAINING ACTIVITIES.

(3) Intensive services.--

(A) In general.--Funds allocated to a local area for adults under paragraph (2)(A) or (3), as appropriate, of section 133(b), and funds allocated to the local area for dislocated workers under section 133(b)(2)(B), shall be used to provide intensive services to adults and dislocated workers, respectively--

(i)(I) who are unemployed and are unable to obtain employment through core services provided under paragraph (2); and

(II) who have been determined by a one-stop operator to be in need of more intensive services in order to obtain employment; or

(ii) who are employed, but who are determined by a one-stop operator to be in need of such intensive services in order to obtain or retain employment that allows for self-sufficiency.

(B) Delivery of services--Such intensive services shall be provided through the one-stop delivery system--

(i) directly through one-stop operators identified pursuant to section 121(d); or

(ii) through contracts with service providers, which may include contracts with public, private for-profit, and private nonprofit service providers, approved by the local board.

(C) Types of services--Such intensive services may include the following:

(i) Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include--

(I) diagnostic testing and use of other assessment tools; and

(II) in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.

(ii) Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals.

(iii) Group counseling.

(iv) Individual counseling and career planning.

(v) Case management for participants seeking training services under paragraph (4).

(vi) Short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training.

Program of Training Services: CFR 663.508 – One of more courses or classes that, upon successful completion, leads to (1) a certificate, an associate degree or baccalaureate degree, or (2) a competency or skill recognized by employers, or (b) a training regimen that provides individuals with additional skills or competencies generally recognized by employers.