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EMPLOYMENT AND TRAINING INSTRUCTION LETTER NO.: 11-09 (replaces WIA Instruction Letter PY'08-29)

SUBJECT: Training Coordination and Satisfactory Progress Policy for Adults and Dislocated Workers

ISSUANCE

DATE: October 21, 2011

EFFECTIVE

DATE: Immediately

EXPIRATION

DATE: Indefinite

PURPOSE: The purpose of this instruction letter is to transmit the Local Workforce Investment Area (LWIA) policy on classroom training coordination for Adult and Dislocated Worker training services funded by the Workforce Investment Act (WIA) program. This instruction letter defines the minimum standards and requirements for participants to enter and continue in classroom training utilizing the WorkLink region's resources.

BACKGROUND: On April 20, 2011, the SC Department of Employment and Workforce (SCDEW) issued a state policy on WIA Participant Lifetime Training Account (ITA) Cap. Each area has been instructed to utilize a system to document all training costs for each WIA participant. The guidelines indicate that each area should track proof of satisfactory progress.

POLICY: Effective immediately, case managers for the Adult and Dislocated Worker WIA programs will adhere to the terms of this training coordination and satisfactory progress policy.

Approval of Training

- A. Prior to issuing an Individual Training Account (ITA) and associated vouchers, the WIA case manager is required to have the following documentation in the participant's hard file:
 - The determination of need for training, including proof that training leads to an in-demand occupation (the assessment and/or case notes, and Individual Employment Plan (IEP) should support the need for training and ability to enter/complete training);
 - For those in occupational training only, a household budget (accompanied by a case note if there is a deficit, detailing how the participant will support themselves while in training);
 - Identification of all financial aid, such as PELL grants, Lottery Tuition Assistance, etc., that has paid or will pay for tuition, books, supplies, fees, etc.;
 - An ITA and associated vouchers (accompanied by a case note of how the participant will pay for any funds not covered by financial aid or WIA) with all appropriate signatures;
 - A copy of the curriculum that matches the training provider's catalog and/or website, or applicable documentation for GED/remedial/developmental courses; and
 - The participant's class schedule, which must meet the training provider's definition of full-time student.

- B. To issue vouchers for additional training provider terms or sessions, the following must be in the file in addition to the items listed above in letter A:
 - Proof of satisfactory progress (progress reports, grades, mid-term grades);
 - All time/attendance sheets notated with timely submittal and appropriate signatures; and

- Pending and/or redeemed vouchers in the file with supporting documentation.
- C. To issue an ITA and associated vouchers for participants entering training with credits towards a degree program and requesting to finish coursework in order to obtain this degree using WIA resources, the following documentation must be in the hard file in addition to the items listed above in letter A:
- Most recent transcripts from training provider, indicating the following criteria have been met at the time of enrollment into a training activity code:
 - Successful completion of 12 credit hours in curriculum
 - A cumulative GPA of 2.5* or higher
 - A cumulative completion rate of 90%* or higher
 - A clear student bill
 - For entry into programs that have waitlists (i.e. Registered or Licensed Practical Nursing), a letter of acceptance into the program of study (all pre-requisites must be completed at the time WIA funding begins).

Case Managers shall ensure that the total number of participants being served under letter C listed above does not exceed 15% of the total active participants in WIA (tracked from July 1 to June 30).

All approved training programs approved must be listed on the Eligible Training Provider List (ETPL), must be directly related to one of the Board endorsed industry clusters, and must lead to an in-demand occupation supported by available labor market information. (O*Net refers to in-demand as Bright Outlook.)

All students must be enrolled full-time during their WIA-funded training. Students will abide by the definition of full-time status as set forth by the training provider. Not all training providers have the same full-time status definition, particularly during the summer sessions. WIA Case Managers shall verify the full-time status definition with the training provider. The only exception to full-time status will be if the student needs fewer classes than the training provider's definition of "full-time" during their last semester leading to graduation. The case manager shall verify this with the training provider prior to approving "less than full-time" training.

Curricula Changes

Participants may not change courses/degree tracks/career fields from their original IEP without prior approval. The WorkLink WIA will not be responsible for tuition costs or related expenses associated with occupational training that is not specified in a mutually agreed upon IEP.

Under no circumstances may a participant train in more than two curricula during participation in the Workforce Investment Act. This limitation does not apply to successful completion of a course/curriculum that leads to advanced curriculum. *Example:* A participant completes Certified Nursing Aide training and follows with Licensed Practical Nurse training. The Certified Nurse Aide occupation could provide income support while pursuing the Licensed Practical Nurse credential.

Definition of Satisfactory Progress

Students receiving financial aid for occupational training from WIA in the WorkLink region through an

*Under this policy, GPAs are not to be rounded. Example: GPA 1.99 should not be rounded to 2.0.

**Under this policy, Cumulative Completion Rates are not to be rounded. Example: 89.9% should not be rounded to 90.0%.

ITA are required to make satisfactory academic progress towards a degree, diploma, or certificate. The WorkLink WIA may deny continued financial aid to any participant not making satisfactory measurable progress.

The definition of satisfactory progress for Adult and Dislocated Worker training services for the WorkLink region is as follows:

Occupational Training

- Participant attains/maintains a minimum cumulative grade point average*** (GPA) of 2.0 (or higher if required by the curriculum and/or training provider);
- Participant attains/maintains a cumulative completion rate of 90% or higher; and
- Participant abides by the attendance policy of the training provider.

Remedial Training

- Participant attains/maintains a grade of Satisfactory (S) and/or Passing in GED or Remedial/Developmental Courses;
- Participant is tested at least every six months;
- Participant shows improvement (gains evaluated on an individual basis by the case manager and the training provider); and
- Participant abides by the attendance policy of the training provider.

The Adult and Dislocated Worker Service Provider must ensure that participants are provided with the strictest academic and attendance requirements as set forth by the training provider or by the WorkLink WIB, and the consequences of failure to meet minimum standards prior to the start of training. The minimum standard grade point average or letter/numerical grade shall be incorporated into the participant's IEP.

The WIA case manager will be responsible for ensuring these requirements have been met and that all pertinent information regarding the participant's training is recorded in the SC Works Online System (SCWOS), case notes, and documentation in the participant's hard file.

Tutoring/Remediation

The participant and the case manager share the responsibility to assure success for the participant in their chosen training course. The participant must report difficulties with grades at the first indication of a problem. This should be impressed on the participant during the initial career counseling session when training is discussed.

If the WIA case manager discovers a participant is experiencing difficulty with a particular subject, the training provider should be notified immediately. The WIA case manager will ensure that remedial/tutorial action can be taken to assist the participant through available resources. One-on-one tutoring subsidized by WIA is an allowable cost. Timely identification of the need for tutoring is critical. While developing the IEP, it shall be the case manager's responsibility to apprise the participant of tutoring assistance. Any problems that arise should be thoroughly discussed, and if tutoring is needed, the IEP should be revised to include tutoring services.

***Under this policy, a 2.0 GPA equates to a grade letter of "C."

Unsatisfactory Progress

If the participant fails a class, but the overall required minimum GPA of 2.0, Satisfactory "S," and/or Passing (or higher, if required by the curriculum and/or training provider) is still met, the WIA program will pay for a maximum of one (1) repeat class. However, if the participant fails a class, the entire curriculum must be reviewed by the WIA case manager to ensure that it is still possible to finish the training program within the given fund limitations per the IEP or ITA. The Case Manager shall also review the Satisfactory Progress standards with the participant as set forth in this policy.

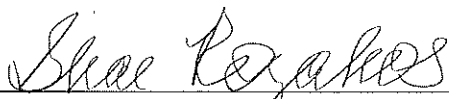
Failing two (2) or more classes (regardless of whether it is two different classes or the same class and whether it is simultaneously or consecutively) will be considered lack of satisfactory progress and will result in the termination of WIA-funded training.

If a participant enrolled in adult or dislocated worker training services for the first time fails to attain/maintain a minimum cumulative GPA of 2.0, Satisfactory "S," and/or Passing (or higher, if required by outside awarded financial aid, the curriculum and/or training provider), the participant will be allowed one (1) subsequent semester/term to attain/maintain the satisfactory progress required. Prior to the approval of the subsequent semester, the WIA case manager must re-evaluate suitability for participant's future training services funded by WIA and shall also review the entire curriculum to ensure that it is still possible to finish the training program within the given time limitations per the IEP and ITA. If the participant fails to meet the satisfactory progress requirement after the subsequent semester/term, the failure to comply with the satisfactory progress requirement will result in the termination of WIA funded training and discontinuation of WIA payments associated with that training.

If a participant fails an exam, license, or certification that WIA has paid for, the WIA Program will pay for one (1) retake.

ACTION: All applicable WorkLink Workforce Investment Area service providers, sub-recipients, contractors and other applicable organizational elements will implement and comply with these instructions, as well as any related instructions contained in applicable contractual agreements.

INQUIRIES: Direct all inquiries on this Instruction Letter to WorkLink Workforce Investment Board Staff, Jennifer Kelly, WorkLink, 511 Westinghouse Rd, Pendleton, SC 29670, telephone 864.646.5898, or email jkelly@worklinkweb.com.



Shae Rozakos, Executive Director
WorkLink Workforce Investment Board

DISTRIBUTION: All WIA Staff