



1. Background

WIOA provides program guidelines for providing pre-employment education, also known as work readiness training, to eligible adults and dislocated workers. Pre-employment educational services are designed to prepare individuals for training or employment.

2. Definitions

- **Brokering agency:** an entity designated by the Spokane Workforce Council (SWC) to be responsible for authorizing pre-employment education agreements and provide payments for pre-employment education services.
- **Pre-employment education:** individualized career services, such as basic academic education or work readiness training, that are designed to prepare individuals to enter training or to obtain or retain employment. WIOA Title I-funded pre-employment education services must be provided by a service provider designated by the SWC or through an agreement with a local training provider. While these services are often referred to as “training,” they are not considered training services under WIOA. These services cannot be funded through an Individual Training Account (ITA) unless connected to a training service as defined under WIOA Section 134.
- **Pre-employment education provider:** a public or private organization that provides pre-employment education services designed to prepare individuals to enter training or to obtain or retain employment.
- **Service provider:** a provider of workforce development services in Spokane County, such as the local one-stop center or other entity designated by the Spokane Workforce Council (SWC), that is responsible for determinations of program eligibility, documentation, self-attestation guidelines, and other eligibility and documentation requirements as defined by the SWC.
- **WorkSource System Tools (WST):** A management information system that workforce development organizations in Washington State use to collect data and manage themselves efficiently and effectively.

3. Policy

Providing pre-employment education services to individuals can be done by a service provider designated by the SWC or through an agreement with a pre-employment education provider. Guidelines and requirements when providing pre-employment education services are listed below:

- a. **Types of pre-employment education services** – Many pre-employment education services share some of the same activities, such as learning skills, communication, critical thinking, study skills, and research skills. The definition of these services is based more on intent than on the specific skills being trained. These services may be delivered physically and/or virtually. Pre-employment education services are considered individualized career services and are defined as follows:
 - i. **English language acquisition** – Services that:
 1. Are designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; and
 2. That lead to attainment of a secondary school diploma or its recognized equivalent and transition to postsecondary education or employment.

Note: this service may be considered a training service if offered concurrently or sequentially with an allowable training service.

- ii. **Financial literacy services** – Services that support the ability to create household budgets; initiate savings plans; make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals; manage spending, credit, and debt; increase awareness of the availability and significance of credit reports and credit scores; obtain credit; understand, evaluate, and compare financial products, services, and opportunities; and address financial literacy needs of non-English speakers.
- iii. **Short-term prevocational services** – Services to prepare an individual for training or employment. These services include training for:
 - 1. Learning skills such as creative thinking, critical thinking, working with others, study skills, and researching information;
 - 2. Communication skills;
 - 3. Interviewing skills – general interviewing skills, not specific to job interviews;
 - 4. Punctuality;
 - 5. Personal maintenance skills – means of taking care of oneself, such as proper grooming, personal hygiene, dressing for success, banking/finance skills, cooking, etc.; and
 - 6. Professional conduct – understanding commonly accepted standards regarding personal and business behavior, values, and principles.
- iv. **Workforce Preparation Activities** – Services providing remedial education needed prior to entering postsecondary education or that are necessary to gain employment. This includes activities, programs, or services designed to help an individual acquire:
 - 1. Basic academic skills – reading, writing, basic mathematics, learning skills, communication, time management, study skills, and research skills;
 - 2. Critical thinking skills;
 - 3. Digital literacy – the ability to use information and communication technologies such as smartphones, tablets, and personal computers, to find, evaluate, create, and communicate information;
 - 4. Self-management skills – techniques in utilizing resources, using information, working with others, understanding systems, and obtaining other non-occupational skills necessary for postsecondary education or employment;
 - 5. Non-specific employment skills – general employment skills such as safety, first aid, workplace hygiene, or hazardous materials handling; and
 - 6. Other employability skills that increase an individual's preparation for the workforce.
- v. **Classroom-based training services** – Services that meet the definition of classroom-based training services as described in SWC Policy W408 – Individual Training Accounts for Adults & Dislocated Workers cannot be provided as pre-employment education and must be funded through an Individual Training Account (ITA).
- b. **Requirements to procure pre-employment education services** – authorized one-stop service providers may procure these services with pre-employment education provider through a pre-employment education agreement. A pre-employment education agreement may have an aggregate cost of up to \$1,500 per individual participant.
- c. **Eligibility for individuals to receive pre-employment education services** – Pre-employment education services are considered individualized career services and may only be provided to an individual who is determined eligible for an adult program with established priority or a dislocated worker program. Refer to SWC Policy WS816 R2, Attachment A – Services and Program Eligibility Handbook, for more information on determining eligibility for individualized career services.
- d. **Credentials and pre-employment education** – Any certificates resulting from pre-employment education do not count as credentials under WIOA. Additionally, certificates awarded through an exam without accompanying training, that solely measure skills meeting the definition of pre-employment education, do not count as credentials under WIOA.

4. Documentation and Data Entry Requirements

- a. **Full WIOA registration** – Full WIOA eligibility determination and registration is required to receive WIOA-funded individualized career services. If an individual is determined eligible for one or more Title I programs, all relevant registration elements must be collected and entered into WST. Additionally, any relevant documentation must be collected and stored physically or electronically in the individual's file, including the

assessment used to determine a need for individualized career services. Refer to SWC Policy WS816 R2, Attachment A – Services and Program Eligibility Handbook, for more information on documenting eligibility and the need for individualized career services.

b. Pre-employment education agreement (if applicable) – pre-employment education services that are not provided through the one-stop center or one of its partners may be provided through an agreement between a service provider and a pre-employment education provider. WIOA Title I career service funds may not be expended, and services may not start until a completed agreement is in place.

i. Agreement requirements – the agreement must contain or document the following information:

1. Name and contact information of the service provider and pre-employment education provider;
2. Information regarding the pre-employment education program, including a description of the training to be provided, estimated length, and intended outcome;
3. Period of performance for the agreement;
4. Detail of costs associated with the training, including but not limited to tuition, registration fees, books, and educational supplies;
5. Detail of funding sources to be used to fund the training, including any fairly evaluated in-kind contributions;
6. Whether the education program will be delivered through individual referrals or through group-sized training;
7. How the education provider(s) will report participant information and expenditures related to the training;
8. Assurances for the service provider(s), including:
 - a. The service provider(s) shall ensure none of its activities discriminate against, deny benefits to, deny employment to, or exclude from participation any persons on the grounds of race, color, national origin, sex, disability, or political affiliation or belief; and
 - b. The service provider(s) will ensure grievances and/or discrimination complaints are referred to the appropriate entity for resolution;
9. Assurances for the pre-employment education provider(s), including:
 - a. The pre-employment education provider(s) shall maintain records and reports with regard to services performed under the agreement, which shall include records pertaining to attendance, progress reports, and any other reports relating to the individuals being trained;
 - b. The pre-employment education provider(s) shall make all records and reports with regard to services performed under the agreement available for inspection, examination, and audit by authorized representatives of the service provider and by such officials as may be required by law;
 - c. The pre-employment education provider(s) shall ensure access to the training complies with the Americans with Disabilities Act (ADA);
 - d. The pre-employment education provider(s) must not be presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency;
 - e. The pre-employment education provider(s) shall ensure none of its training programs or activities discriminate against, deny benefits to, deny employment to, or exclude from participation any persons on the grounds of race, color, national origin, sex, disability, or political affiliation or belief; and
 - f. The pre-employment education provider(s) will ensure grievances and/or discrimination complaints are routed to the service provider for prompt resolution.

c. Service requirements – information regarding the individualized career service used must be entered into WST for each participant as follows:

- i.** An appropriate qualifying service (or services) must be entered into WST to represent the pre-employment education program (see SWC Policy WS816 R2, Attachment C – Spokane WorkSource Services Catalog). If funding is being provided by more than one funding source, a service must be entered for each funding source as appropriate.

- ii. The service(s) must document the start and estimated end date of the pre-employment education program as appropriate in WST. For an education program that has begun prior to enrollment, the enrollment date of the respective program is used in place of the education program start date. When the overall education program ends, this is to be used as the end date of this service (or services).
- iii. Case notes must be entered detailing the start of the pre-employment education program, progress, and the outcome.

5. Action Required

Agencies responsible for managing pre-employment education services, either as a brokering agency, a service provider, or both, are defined by contract with the SWC. Minimum requirements for these agencies are below:

- a. **Brokering Agencies** – brokering agencies, as identified in the local plan, are required to:
 - i. Maintain policies and procedures for the authorization and obligation of pre-employment education services and related payments;
 - ii. Develop a method or methods with which payments will be made for pre-employment education services, such as through electronic funds transfer or a voucher system; and
 - iii. Coordinate agreement modifications and deobligations with service providers.
- b. **Service Providers** – service providers who determine eligibility for career services and refer to a brokering agency as identified in the local plan are required to:
 - i. Maintain policies and procedures for determining career services eligibility and how the eligibility and requirements for pre-employment education will be documented;
 - ii. Coordinate contract modifications and deobligations with brokering agencies; and
 - iii. Track all pre-employment education expenditures in each participant's physical or electronic file.

6. References

- TEGL 19-16 – Guidance on services provided through adult, dw, and wp programs
- 20 CFR 680.150 – What career services must be provided to adults and dislocated workers?
- 20 CFR 680.160 – How are career services delivered?
- 20 CFR Subpart E – Priority and special populations
- WIOA Section 129(b)(2)(D) – Supporting financial literacy
- WIOA Section 134(c)(2)(A)(xii)(VI) – Short-term prevocational services
- WIOA Section 134(c)(2)(A)(xii)(IX) – Financial literacy services
- WIOA Section 134(c)(2)(A)(xii)(IX) – Workforce preparation activities
- WIOA Section 134(c)(2)(A)(xii)(XI) – English language acquisition

7. Supersedes

SAWDC Policy #W408 – Classroom Training: Individual Training Account & Pre-vocational Training Policy

8. Attachments

N/A

Revision History:

SAWDC Policy #408 (second revision) – June 2014

SAWDC Policy #408 (first revision) – June 2012

SAWDC Policy #C – June 2004