



1. Background

The following guidance is intended to describe what is necessary to assess a WIOA title I participant's eligibility to receive training services, as defined in Section 134(c)(3)(A)(i)(I) of the Workforce Innovation and Opportunity Act (WIOA). According to WIOA:

Funds allocated to a local area for adults and dislocated workers shall be used to provide training services to adults and dislocated workers, who, after an interview, evaluation, or assessment, and career planning, have been determined by a one-stop operator or one-stop partner, as appropriate, to —

- a. Be unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services;
- b. Be 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; and
- c. Have the skills and qualifications to successfully participate in the selected program of training services.

2. Definitions

- **Training Assessment** – In this guidance and in policies referenced in this guidance, the Spokane Workforce Council (SWC) refers to the “interview, evaluation, or assessment, and career planning” requirement described in the background section above as a “Training Services Assessment” or a “Training Assessment”.
- **Service Provider** – The SWC refers to the one-stop operator (the subrecipient agency, not the individual) and one-stop partners described in the background section above collectively as a “service providers”. The SWC additionally defines service providers as a providers of workforce development services in Spokane County, such entities located at the local one-stop center or other entities designated by the Spokane Workforce Council (SWC), that are responsible for determinations of program eligibility, documentation, self-attestation guidelines, and other eligibility and documentation requirements as defined by SWC policy.

3. General guidelines for training assessments

- a. At the time of comprehensive eligibility determination, a service assessment for individualized career services and/or training services is required.

- i. This assessment must be documented using either a “Comprehensive and Specialized Assessment” or a “Development of Individual Employment Plans” service in ETO. If using a development of an IEP to document a training assessment, all requirements of the training assessment, including review and approval, must be part of the IEP development. A training assessment that is completed and approved as part of program eligibility determination can share the same service.
 - ii. For an individual who is determined ineligible for the selected program of training services, staff must attempt to redirect them to a different training service that they may be eligible for or appropriate career services. If the individual declines other services or is determined ineligible for WIOA title I services, then the service recorded for the assessment, Comprehensive and Specialized Assessment or Development of Individual Employment Plans, must be attached to Wagner-Peyser in ETO.
- b. If a training services assessment is completed after the program eligibility process, it must be documented on a separate Comprehensive and Specialized Assessment or Development of Individual Employment Plans service in ETO and reviewed by a staff person other than the one who completed the assessment.
 - c. A training assessment must be completed and approved before an ITA or OJT may be awarded to a WIOA title I participant. This assessment can be completed and approved prior to, or as a part of, the development of an ITA or OJT.
 - d. When a job seeker’s circumstances change after enrollment and/or after approval/denial of the training assessment, the training assessment can be updated, and this may change the eligibility for training services. This is especially common during the development of an ITA or OJT. Updates to the training services eligibility determination must be reviewed and approved before receiving an ITA or OJT.

4. Questions that are necessary to complete the training assessment

Below are assessment questions and example responses that would meet the requirements of each question. Each question must be answered “yes” to be eligible for the selected training service.

- a. What is the job seeker’s occupational goal and desired program of training services?
Examples:
 - i. An OJT in a driving occupation.
 - ii. A license refresher course for a registered nurse.
 - iii. Commercial driver’s license training to be a truck driver.
- b. Based on their previous work history and education, why is the customer unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services?
Examples:

- i. Their previous occupation(s) is not in demand in Spokane or in an area the individual wishes to move to.
 - ii. They do not have the experience or education typically required for their previous occupation(s) or industry(ies).
 - iii. They have not worked in their previous occupation or industry for a significant period. This timeframe should vary depending on the amount of experience and education the individual has compared to what is required for the occupation.
 - iv. They have a health, disability, or legal reason they are unable to work in their previous occupation or industry.
- c. Why are they 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? The SWC requires each of the two factors to be considered for need:
- i. Is the training necessary for them to obtain or retain employment? Examples:
 - 1. The training is required or preferred for employment based on local labor market information.
 - 2. The training will help to close a skills gap or provide a steppingstone in a new or previous occupation.
 - ii. Do they need WIOA funding to pay for part or all a training because they are unable to pay for the training themselves and they are ineligible for other grants or other grants have insufficient funding to pay for, or unable to pay for, certain expenses? Examples:
 - 1. They need financial assistance due to being below 100% of either self-sufficiency **or** income adequacy.
 - 2. They are unable to obtain funding from other sources that will cover the full cost of training.
 - 3. They have applied for Pell and are not eligible and have no other sources of funding.
 - 4. They have WorkFirst funding that can pay for part of the training, but not all of it.
- d. Do they have the skills and qualifications necessary to participate in the selected program of training services? Examples:
- i. They have transferable skills that will help them be successful in their new career direction, such as customer service skills.
 - ii. They have the necessary academic skills to participate in the training, such as foundational math skills or a high school diploma.
 - iii. They have met pre-training requirements, such as physicals, driver's abstracts, background checks, etc. These requirements should be paid through supportive services and not self-paid or charged as training expenses.

5. Examples of why a job seeker might be eligible for only limited training service funding

- a. Their income adequacy and self-sufficiency are both above 100%, but their budget surplus is not enough to cover the full cost of training.
- b. They can obtain some funding from other sources, but not enough to cover the full cost of training.
- c. Funding is limited and their priority level has limited the amount of WIOA training funds they are eligible for.
- d. They intend to participate in an OJT with a wage that is above the maximum reimbursement rate.

6. Examples of why a job seeker might not be eligible for any training services funding

- a. They have recent education and/or experience that meets the requirements for one or more demand fields.
- b. They do not meet a required prerequisite, such as not passing a background check or having a poor driving record.
- c. The training being asked for is not typically required or preferred by the occupational goal.
- d. Their income adequacy and self-sufficiency are both above 100% and their budget surplus is enough to cover the full cost of training.
- e. They can obtain funding from other sources that will cover the full cost of training.
- f. WIOA funding is limited, and there is no funding available for their current priority level.
- g. They are seeking an OJT but are otherwise qualified for the position and have not demonstrated difficulty finding work in their occupation through career services.
- h. They are seeking an OJT with an employer they already work for, and the proposed OJT does not include a wage increase or other benefit.

7. Example Assessments for ITA's

a. Job Seeker #1 – John (eligible for training services)

- i. **What is John's occupational goal and desired program of training services?**
 - Marketing training for a self-employed massage therapist.
- ii. **Based on his previous work history and education, why is John unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services?**
 - John worked in a massage therapy clinic for the last 10 years before being laid off. While massage therapists are in demand and average wages appear

to be high enough for him to be self-sufficient, John has been unable to find employment that pays a sufficient wage and local job postings support that – see attached job postings for Spokane County. Because he has been unsuccessful in finding an hourly massage position that pays enough to support his family, he determined he needs to own his own business to earn enough money.

iii. **Why is the training needed for John to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment?**

- John recently started his own massage therapy business but lacks the skills to market and grow his business to a level that will provide him with a self-sufficient income.
- John is currently at 83% Income Adequacy and 33% Self Sufficiency and is unable to cover the cost of the training. He is ineligible for Pell grants and is not eligible for any other non-WIOA grants.

iv. **Does John have the skills and qualifications necessary to participate in the selected program of training services?**

- John possesses his massage therapy license and the necessary equipment needed to run his business.

b. Job Seeker #2 – Jim (eligible for partial training services funding)

i. **What is Jim’s occupational goal and desired program of training services?**

- Welding training to return to work as a certified welder.

ii. **Based on his previous work history and education, why is Jim unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services?**

- Jim has worked as a warehouse shipping clerk for the last 6 years and this occupation is not in demand in Spokane County.

iii. **Why is the training needed for Jim to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment?**

- As Jim’s previous occupation is not in demand, it’s unlikely he’ll find employment that is self-sufficient. Additionally, he needs his certifications in welding to obtain employment as a welder.
- Jim is in need of WIOA assistance to pay for a portion of the cost of training. He is currently at 82% Income Adequacy and 24% Self Sufficiency, but WorkFirst is paying the majority of the training. Jim is asking WIOA to assist with the remainder of the training cost.

iv. **Does Jim have the skills and qualifications necessary to participate in the selected program of training services?**

- Jim previously worked as a welder over 10 years ago. The knowledge and skills he learned then will ensure he is successful with this occupation.

c. Job Seeker #3 – Jane (not eligible for training services)

i. **What is Jane’s occupational goal and desired program of training services?**

- Commercial driver’s license training to be a truck driver.

ii. **Based on her previous work history and education, why is Jane unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services?**

- Jane is not considered unlikely or unable to obtain or retain employment through career services. Jane worked recently as a registered nurse and made roughly the average wage for that occupation in Spokane County. Registered nurses are a demand occupation in Spokane County. Based on her education and experience, Jane appears likely to return to work as a registered nurse through career services.

iii. **Why is the training needed for Jane to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment?**

- The training requested is not necessary for Jane to obtain or retain employment. Jane has the necessary skills and experience to obtain a job as a registered nurse making comparable or higher wages than previous employment. Registered nurses have a salary well above the self-sufficiency standard for her family size.
- Jane lacks a need for WIOA assistance to pay for the cost of training. She is currently at 108% Income Adequacy and 250% Self Sufficiency, with a budget surplus of \$3,657 per month.

iv. **Does Jane have the skills and qualifications necessary to participate in the selected program of training services?**

- Jane has not demonstrated any of the required qualifications to be a commercial truck driver at this time.