



## POLICY

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<b>CATEGORY:</b>	<b>Workforce Programs- WIOA</b>	<b>No: 4.1.105.01</b>
<b>TITLE:</b>	<b>Apprenticeship Training Programs</b>	
<b>SUPERSEDES:</b>	<b>4.1.105.00 , dated December 15, 2017</b>	
<b>EFFECTIVE:</b>	<b>September 18, 2020</b>	
<b>BOARD APPROVAL:</b>	<b>September 17, 2020</b>	
<b>DATE REVIEWED :</b>	<b>September 3,2020</b>	

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### **I. PURPOSE:**

Apprenticeship Training is an activity and service established by Workforce Solutions of the Coastal Bend for the purpose of providing apprenticeship services to eligible Workforce Investment Opportunity Act (WIOA) Adults, Dislocated Workers, and Out Of School Youth (OSY). From time to time other funding sources such as National Dislocated Grants may also be used to fund apprenticeship activities. Establishment and uses of apprenticeship training is governed by WIOA Rules.

WIOA provides workforce activities that increase employment, retention, and earnings of participants. WIOA provides an opportunity for the workforce system to expand its business base and offer job seekers greater employment prospects while offering employers a strategic approach to talent development.

It is mandated for all registered apprenticeship programs consist of the following five core components- direct business involvement, OJT, related instruction, rewards for skills gain and a national occupational credential. Reference: Department of Labor (DOL)- TEGL 13-16, issued January 12, 2017.

### **II. DEFINITIONS:**

*Registered Apprenticeship- authorized by the National Apprenticeship Act of 1973; in conjunction with State Apprenticeship Agencies which are required to meet federal and state standards, issuing certificates of completion to apprentices, encouraging the development of training programs and protecting the safety and welfare of apprentices, and assure programs provide high-quality of training.*

*Participant - An individual who has been determined to be eligible to participate in and who is receiving services under a program authorized by WIOA.*

*Service Provider* - An individual or organization under contract with the Board that provides training or professional services in support of workforce activities (administrative and operational) conducted by or on behalf of the Board.

### **III. POLICY STATEMENT**

All training for which apprenticeship activity is provided must be listed in the Eligible Training Provider List (ETPL). Due to the rigorous application and vetting process by the Office of Apprenticeship within the US Department of Labor Employment and Training Administration (DOLETA), all registered apprenticeship programs are automatically eligible for the statewide ETPL. Additionally, consistent with the Board's Business & Strategic Plan, customers must be interviewed and assessed to ensure the provision of apprenticeship services are justified within the individual's employment plan.

Apprenticeship services may be provided regardless of whether the individual has received basic or individualized career services first; there is no sequence of service requirement.

#### **WIOA Funding**

It is important to emphasize that, under WIOA; the opportunity for an individual to enroll in an apprenticeship program does not rely exclusively on the availability of WIOA training funds. In all cases, the resources of partners as well as federal, state, local, and personal funding sources must be taken in account in the development of the individual's employment plan. WIOA funding for apprenticeship training is limited to participants who are unable to obtain sufficient grant assistance from other sources to pay the full costs of training.

However, WIOA funds cannot be used to pay training costs:

- For any portion or term of training for which the participant has signed a loan as part of financial aid; or
- That were paid by the participant (or another source) prior to WIOA program registration.

Apprenticeship training for WIOA eligible participants will be limited to those occupations for which there is a demand in the Coastal Bend and appearing on the Target Occupation List.

A waiver may be given to training in occupations that are not listed on the Board's Targeted Occupations List, but are determined to be in sectors of the economy which have a high potential for sustained demand or growth, if the following criteria are met:

- 1) Written evidence from employers that confirms projected annual openings for the occupation at a level equivalent to the Board's current annual opening criteria for targeted occupations.

- 2) Written evidence from employers that verifies completers of the training will be paid at a wage that is in compliance with the Board's current wage criteria for targeted occupations; and
- 3) Written evidence that the skill set which will be acquired through the skill training meets current skill needs of Coastal Bend employers.

### **Apprenticeship Limits**

The lifetime limit of an apprenticeship is \$7,000 per program participant. The use of apprenticeship funds is limited to tuition expenses, fees, and books and supplies as required by the registered apprenticeship for any WIOA Eligible Participant enrolled.

The length of apprenticeship training and skills and competencies required for mastery are set by the registered apprenticeship and industry. A copy of the approved apprenticeship curriculum must be included in participant file. Traditional Registered Apprenticeship programs are time-based and require a specific number of hours of on the job learning and related instruction.

No participant can be enrolled for more than two and one half (2½) academic years (5 semesters, 4 summer sessions, 10 quarters or 7 trimesters). Exceptions to these limits may be made on a case-by case basis. However, exceptions to the maximum limit and duration of an apprenticeship must be submitted to the President/CEO or designated person of Workforce Solutions of the Coastal Bend with well documented justification for approval. Requests for an exception must include evidence that supports that all efforts were made to identify, secure, and use other financial resources prior to seeking WIOA funding.

Changes to the apprenticeship training will be allowed as long as the change is in line with the individual's employment and career path and is approved by the WFSCB Career Center Manager. The request for change to the training program must be justified and properly documented. Participants who change apprenticeships plans must provide a revised apprenticeship plan, which demonstrates their ability to complete the apprenticeship within the original time period. The change must be consistent with assessments, FEP/ISS, in demand target occupations, skills and aptitudes of the student. Additionally, the new apprenticeship of must be on the state approved training provider/course list. A limit of one (1) apprenticeship change will be allowed on each participant.

### **IV. PROCEDURES:**

The participant's case file must contain a determination of need for apprenticeship services as identified in the Family Employment Plan/Individual Services Strategy (FEP/ISS), comprehensive assessment. WIOA removed the sequence of service requirement established under WIA.

Prior to enrolling a participant for any apprenticeship service, a Case Manager must develop with the participant a Family Employment Plan/Individual Service Strategy (FEP/ISS). The FEP/ISS is used to develop an employment objective for the participant and a plan of action, including appropriate training, to achieve that objective.

The FEP/ISS must identify the occupation in demand that will be pursued and the required skills competency level associated with the apprenticeship service. In addition to the FEP/ISS, documentation supporting the participant's eligibility must be maintained in the participant's case file. The documentation must support the fact that the apprenticeship is needed in order for the participant to gain the appropriate level of skills for employment at a self-sufficient wage. If apprenticeship services are identified as an appropriate and necessary step toward achievement of employment for the participant in an appropriate occupation included on the Board's targeted occupations list the customer can choose the appropriate registered apprenticeship from among those in the Eligible Training Provider List (ETPL). This determination that the apprenticeship identified and selected will provide the participant an opportunity to an appropriate level of employment at a self-sufficient wage must be supported by documentation in the participant's case file.

To help ensure that participants will complete their apprenticeship, the participant will be required to demonstrate that they have the adequate resources to sustain themselves and/or their family during the training period without the use of student loans. As per DOL guidance, apprenticeships earn a wage from day one. It is imperative for WFSCB Case Managers to work with a participant on budgeting since some income will be coming into the household; unlike some other types of training where employment and/or earning wages is not part of training component.

The WFSCB Case Manager will work with the customer to identify the resources that are needed and all resources that are currently available to pay for apprenticeship cost(s), including the customer's financial resources, federal, state, and local grants and programs. All resources must be identified. Pell Grants and other financial resources will be combined with WIOA funds to cover total apprenticeship expenses; WIOA funds will be considered the last resource of funds.

Taking into account the cost of the apprenticeship as shown in the ETPL, as well as other resources available to the participants, such as the GI Bill, other assistance from the Veterans Administration, Hazelwood Act, Texas Grant Monies, assistance from the Vocational Rehabilitation Services (VRS) and other such agencies, private scholarships, Pell Grants and others, an apprenticeship is created for the participant. A determination of apprenticeship cost is determined by workforce staff, processed by the set fiscal protocols for payment to the registered apprenticeship. The cost must be sufficient to cover the cost of training, as identified in ETPL, less the sum of other resources available to the participant. All payments made to registered apprenticeship costs associated with apprenticeship and the balance remaining from the Board's apprenticeship cap limit of \$7,000.00, must be documented in the participant's case file and entered into TWIST. At no time should participant's apprenticeship cost should be

exceeded without the signed approval of the Career Center Manager, based on well-justified and documented good cause. Expenditures made in excess of the apprenticeship board cap limit, without Career Center Manager approval based on well-justified and documented good cause may not be reimbursable to the service provider.

In some cases, actual cost of apprenticeship may be less than the amount of indicated on ETPL; in such a case is not money owed to the participant. In all cases, unused balances should be “zeroed-out” as soon as it is determined that there is an excess. On the other hand, if actual costs exceed the training costs as stated in the ETPL, Case Managers must request approval from the Career Center Manager for an adjustment in the apprenticeship amount. Changes to apprenticeship amount must include evidence that supports the requested increase, e.g., the ETPL training detail print-outs that reflect the differences between both costs.

Participants are not limited in time by the certification and expiration dates included in provider’s ETPL certification. The two and one half year (2½) ITA time limit may be extended for participants who are enrolled in apprenticeship. However, any extensions of time beyond the 2 ½ year apprenticeship time limit must be approved by the Career Center Manager and handled on a case-by-case basis.

A statement that payment of apprenticeship cost is subject to the availability of WIOA funds should be included in every participant case file and counselor notes. Additionally, a statement should also be added that apprenticeship costs may not be used for payment of late fees, fines, or penalties caused by participant error or delay.

Participants enrolled in apprenticeship services are expected to:

- attend classroom instructions and/or on the job learning activities regularly,
- have contact with their Case Manager on a monthly basis to identify all problems that might affect their successful completion of apprenticeship and
- to coordinate apprenticeship entry requirements with actual registered apprenticeship.

Career Center professionals must inform customers that although any financial aid awarded is for a specific amount of money, individual vouchers will be issued to registered apprenticeship as agreed upon with WFSCB; on an interim basis, e.g., one-time upfront payment, month to month. Before a new voucher is issued, Career Center professionals will meet with the participant to re-assess and update student’s financial status. These meetings are to be conducted in person or virtually when deemed appropriate and necessary. By re-evaluating the participant’s financial status, the Career Center professionals may use this information to help assess the customer’s ability to contribute toward paying for requested services. Additionally, the Career Center professionals may recommend other outside resources to pay for needed training and/or supportive services.

The determination as to whether a customer receives another voucher for the requested services depends upon the results received from this evaluation process. A

change in the student's financial condition may affect their level of financial support. Participants are expected to demonstrate progress in their apprenticeship and to request tutorial assistance if needed from the registered apprenticeship's director and or registered apprenticeship authorized representative of instruction and to supply their progress reports to their case managers as they are received. These policies and expectations must be reflected in a Participant Service Agreement developed by the Career Center service provider.

### Service Provider Responsibilities

The Career Center service provider will be responsible for the development of the following procedures in the application of the WIOA Adult, Dislocated Worker, and OSY training services provided through an apprenticeship:

- Written procedures for timely data entry of apprenticeship information into TWIST and other board approved tracking data bases such as Gazelle (program eligibility, agreements, verification of participant's enrollment into a registered apprenticeship, financial assistance, funding sources, transaction amounts, balances, etc.)
- A process for tracking and documenting all resources paying for the participant's apprenticeship including WIOA Title I funds to ensure non-duplication of payments.
- Internal procedures for the issuance of financial support services including method of disbursement of funds and authorization for approval with Participant Agreement forms (cash reimbursement, lines of credit, etc.).
- A process for documenting how other sources of funding were sought and/or how they apply to the cost of a registered apprenticeship.
- The internal procedure for the issuance of a check request. This must include identification of those individuals who are required and authorized to approve/sign apprenticeship costs. It must also specify the use of Participant Agreement forms.
- A process on how apprenticeship and financial assistance policies and procedures will be disseminated to participants of the WFSCB Career Center in simple, concise, and understandable language.
  
- A process to collect and coordinate the documentation of participant enrollment and attendance, progress reports, and case management contacts required during entire apprenticeship.
- A process for providing the following to participants:
  - Labor market information on targeted in demand occupations and related skill standards/skill competencies of eligible program for which an apprenticeship may be issued; access to the list of eligible certified training providers through the ETPL; and
  - On-going information on the status of their individual apprenticeship costs.

- Report apprenticeship costs and balances by participant to the Board on a quarterly basis and conduct analysis on the total apprenticeship cost obligation to available budget.

The Career Center service provider will also be responsible for the following:

- Assisting participants in applying for any financial aid that would cover expenses associated with apprenticeship.
- The Career Center will be responsible for ensuring that Board funds purchase required tools, books, supplies, uniforms, etc.
- Conducting financial tracking for each service on the Financial Client Management System.
- Board approved pamphlets that communicate the policies, procedures, and financial tracking elements pertaining to apprenticeships for distribution to participants.
- Ensuring that each voucher will be valid **only** for the amount and length of time specified on the voucher, and each participant **must** follow their individual FEP/ISS.
- Ensuring that a copy of the apprenticeship vouchers issued are kept in the participant's file and in the accounting file.
- Developing an agreement with each local training institution that details the method of payment from all sources dedicated to completion of training.
- Adherence to Grievance procedure 29 CFR 37.70 – 37.80.
- Workforce Development (WD) Letters and other Agency Policy Directives.

## **V. RELATED POLICY INFORMATION:**

20 CFR Part 663

40 TAC 861

Title IV of the Higher Education Act of 1965

WD Letter 24-14, Change 1

WD Letter 17-19

WD Letter 29-19

WIOA- TWC Guidelines for Adults, Dislocated Workers and Youth. September 26, 2016 and Revised April 2020.

WIOA- Final Rules Titles I-IV Published in Federal Register August 19, 2016 and effective October 18, 2016.

TWC, Trade Adjustment Assistance Guide, April 2016 and subsequent issues.

DOL- Training and employment Guidance Letter WIOA No. 13-16; WIOA Registered Apprenticeship dated January 12, 2017.

## **VI. RESPONSIBILITIES:**

WFSCB Career Center Managers shall disseminate to appropriate Career Center professionals and follow the procedures outlined in this policy document.

The Board monitor shall provide oversight and monitoring to ensure full compliance with this policy.

**VII. FORMS AND INSTRUCTIONS:**

**VIII. DISTRIBUTION:**

Board of Directors  Board Professionals  Service Provider Professionals

**IX. SIGNATURES:**

*Larry Peterson* 09/17/2020  
Reviewed by EO Officer Date

*Ken Trevino* 09/17/2020  
President/CEO Date