



January 8, 2018

Workforce Innovation and Opportunity Act Policy Letter No. 15-09.1

To: Workforce Innovation and Opportunity Act Local Workforce Development Boards, Fiscal Agents, and OhioMeansJobs Center Operators

From: Cynthia C. Dungey, Director

Subject: Training Services for Adults and Dislocated Workers

I. Purpose

The purpose of this policy is to provide direction to the local workforce development boards (WDBs) in the provision of training services to adults and dislocated workers.

II. Effective Date

Immediately

III. Rescission

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-09, Training Services for Adult and Dislocated Workers, (July 15, 2015).

IV. Background

The Workforce Innovation and Opportunity Act (WIOA) is designed to provide employment and training opportunities to those who can benefit from, and who need such opportunities. Training services can be critical to the employment success of many adults and dislocated workers. As there is no sequence of services, WIOA staff may determine training services are appropriate, regardless of whether the individual has received basic or individualized career services first.

Under WIOA, training services may be provided if the WIOA staff, including staff from partner programs at the American Job Center (which in Ohio is called OhioMeansJobs center), determines, after conducting an interview, evaluation, or assessment, and career planning, that the individual:

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1. Is unlikely or unable to obtain or retain employment;
2. Needs training services to obtain or retain employment;
3. Has the skills and qualifications to successfully participate in the selected program of training services;
4. Is unable to obtain grant assistance from other sources (for example, Federal Pell Grants, Temporary Assistance for Needy Families (TANF), and State-funded training funds) to pay the costs of such training, or requires WIOA assistance in addition to other sources;
5. Is a member of a worker group covered under a petition for Trade Adjustment Assistance (TAA) and is awaiting a determination;
6. Is determined eligible and a member of a priority population if training services are provided through the WIOA adult program; and/or
7. Selects a program of training services that is directly linked to a state in-demand occupation.

A. Training Services

Training services are provided to equip individuals to enter the workforce and retain employment. Training Services may include:

1. Occupational skills training, including training for nontraditional employment;
2. Registered apprenticeship (which incorporates both on-the-job training (OJT) and classroom training);
3. OJT as outlined in Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-22.1, On-the-Job Training (OJT) Policy;
4. Incumbent worker training (IWT), as outlined in WIOAPL No. 15-23, Incumbent Worker Training (IWT) Guidelines;
5. Workplace training with related instruction, which may include cooperative education programs;
6. Training programs operated by the private sector;
7. Skill upgrading and retraining;
8. Entrepreneurial training;
9. Job readiness training provided in combination with other training services or transitional jobs outlined in WIOAPL No. 15-12, Work Experience for Adults and Dislocated Workers;
10. Adult education and literacy activities, including activities for English Language acquisition and integrated education and training programs, provided concurrently or in combination with other training services;
11. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training, as outlined in WIOAPL No. 15-24, Customized Training Guidelines.

B. Individual Training Account (ITA)

An ITA is the primary method to be used for procuring training services under WIOA. ITAs are established on behalf of a WIOA participant to purchase a program of training services from eligible training providers.

WIOAPL No. 15-11.1 Use of Individual Training Accounts, provides guidance for the use of ITAs.

However, in certain circumstances, a training contract may be used to provide training services, instead of an ITA. These circumstances are referred to as the “training exceptions” or “contract exceptions.” Training contracts may only be used if at least one of the five circumstances apply and the process for their use is described in the local plan:

1. On-the-job training, which may include paying for the on-the-job training portion of a registered apprenticeship program, customized training, incumbent worker training, or transitional jobs;
2. If the local WDB determines there are an insufficient number of eligible providers of training services in the local area to accomplish the purposes of a system of individual training accounts as described in the local plan. This determination process must include a public comment period for interested providers of at least 30 days and must be described in the local plan;
3. If the local WDB determines there is a training services program of demonstrated effectiveness, through criteria developed by the local board, offered in the local area by a community-based organization or another private organization to serve individuals with barriers to employment;
4. If the local WDB determines that the most appropriate training could be provided by an institution of higher education or other provider of training services to facilitate the training of a cohort of multiple individuals for jobs in in-demand industry sectors or occupations, provided the contract does not limit customer choice; or
5. If the local WDB determines a Pay-for-Performance contract is suitable, and ensures that the contract will be consistent with 20 C.F.R. 683.510 (note that no more than 10 percent of the local funds may be spent on pay-for-performance contract strategies as they are defined in section 3(47) of WIOA).

C. Eligible Training Providers

Training services and occupational skills training for which ITAs are used shall only be delivered by providers who have met the eligibility criteria and have been listed on Ohio’s Workforce Inventory of Education and Training (WIET) pursuant to section 122 of the WIOA. WIOAPL No. 16-02, Eligible Training Providers, establishes the criteria for eligible training providers and the procedures for approval on WIET.

Pursuant to 20 C.F.R. 680.530, providers of OJT, customized training, incumbent worker training, internships, paid or unpaid work experience, or transitional jobs are not subject to the requirements applicable to entities listed on the eligible training provider list, and are not included on WIET, the state's list of eligible training providers.

D. Registered Apprenticeship Programs

Registered apprenticeship is an important component for training and employment services that the workforce system can provide to its participants. It is a proven model of job preparation that combines paid OJT with related instruction to progressively increase workers' skill levels and wages. Registered apprenticeship is also a proven business-driven model that provides an effective way for employers to recruit, train, and retain highly skilled workers. Graduates of registered apprenticeship programs receive nationally-recognized, portable credentials, and their training may be applied toward further postsecondary education.

Registered apprenticeship programs may be funded through several mechanisms. The classroom training portion of a registered apprenticeship may be funded through an ITA, per WIOAPL No. 15-11.1. To allow registered apprenticeship programs to be more directly connected to the workforce system, registered apprenticeship programs that have been approved by the Ohio Department of Job and Family Services (ODJFS), as a recognized State apprenticeship agency, are automatically eligible to be training providers and included on WIET per WIOAPL No. 16-02.

V. Definitions

Appropriateness: The possession of qualities that are right, needed, or suitable for training services.

Basic skills deficient: An individual who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Customized training: Training that is designed to meet the specific requirements of an employer (including a group of employers), that is conducted with the commitment by the employer to employ an individual upon successful completion; and for which the employer pays:

1. A significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and such other factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees, relation of the training to the competitiveness of the participant, and other employer-provided training and advancement opportunities; and
2. In the case of customized training involving an employer located in multiple local areas in the State, a significant portion of the cost of the training, as determined by the Governor of the State, taking into account the size of the employer and such other factors as the Governor determines to be appropriate.

Entrepreneurial training: Training that provides the basics of starting and operating a small business, including developing viable business ideas, creating a business plan, and/or assistance in accessing small loans or grants.

Extenuating circumstances: An economic hardship that is beyond the reasonable control of the person(s) responsible for providing financial assistance to the WIOA participant for training.

Family: Per 20 C.F.R. 675.300, two or more persons related by blood, marriage, or decree of court, who are living in a single residence and are included in one or more of the following categories:

1. A married couple and dependent children.
2. A parent or guardian and dependent children.
3. A married couple.

Family self-sufficiency: An economic standard that uses a combination of family members' incomes to determine whether the participant has the means to fund training services.

Incumbent worker training (IWT): Training to employed workers who need additional skills to support job retention and career development.

In-demand industry sector: An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, and local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors as listed on the State In-Demand Occupations list or as defined by the local area per the WIOAPL No. 15-11.1.

In-demand occupation: An occupation that currently has or is projected to have positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy as listed on the State In-Demand Occupations list or as defined by the local area per WIOAPL No. 15-11.1.

Individual employment plan: An individualized career service in which a plan is jointly developed and reviewed by the participant and staff that includes an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to obtain these goals and objectives.

Individual with a barrier to employment: Per section 3(24) of WIOA, an individual who is a:

1. Displaced homemaker (as defined in section 3(16) of WIOA);
2. Low-income individual (as defined in section 3(36) of WIOA);

3. Indian, Alaska native, and Native Hawaiian (as defined in section 166(b) of WIOA);
4. Individual with a disability (as defined in section 3(25) of WIOA), including adults and youth who are in receipt of Social Security Disability Insurance benefits;
5. Older individual (age 55 and older);
6. Ex-offender ("offender" is defined in section 3(38) of WIOA);
7. Homeless individual or homeless child and youth;
8. Youth who is in or has aged out of the foster care system;
9. English language learner, has a low level of literacy, and is facing substantial cultural barriers;
10. Eligible migrant and seasonal farmworker;
11. Individual within two years of exhausting lifetime temporary assistance to needy families (TANF) eligibility;
12. Single parent (including single pregnant woman);
13. Long-term unemployed individual (unemployed for 27 or more consecutive weeks); and/or
14. Other groups of individuals as the State determines to have barriers to employment.

Interim employment (also known as stop-gap employment): Employment that has been accepted for income maintenance prior to, and/or during, participation in career or training services with the intention of ending such employment at the completion of the career or training services and entry into permanent, unsubsidized employment as a result of the services. Interim employment is accepted because the affected workers have lost the primary occupation for which their training, experience, or work history qualifies them. Interim employment can be part-time or full-time and must not be with the same employer from which the affected workers were dislocated.

Occupational skill training: An organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels and results in attainment of a recognized postsecondary credential.

On-the-job training (OJT): Training by an employer that is provided to a paid participant while engaged in productive work in a job that:

1. Provides knowledge or skills essential to the full and adequate performance of the job;
2. Is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, except as provided in section 134(c)(3)(H) of WIOA, for the extraordinary costs of providing the training and additional supervision related to the training; and
3. Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the

training, prior work experience of the participant, and the service strategy for the participant.

Priority population: Individuals who have barriers to employment, who are on public assistance, and who are basic skills deficient are given priority to receive individualized career services and training services. This priority must be consistent with priority of services for veterans and eligible spouses.

Program of training services: Per 20 C.F.R. 680.420, one or more courses or classes, or a structured regimen leading to:

1. An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by Ohio or the federal government, an associate or baccalaureate degree;
2. A secondary school diploma or its equivalent;
3. Employment; or
4. Measurable skill gains toward a credential as described in paragraphs 1 and 2 of this definition or employment.

Pay-for-performance contract strategy: A procurement strategy that uses pay-for-performance contracts in the provision of training services and includes:

1. Contracts, each of which shall specify a fixed amount that will be paid to an eligible service provider based on the achievement of specified levels of performance on primary indicators of performance for target populations within a defined timetable, and which may provide for bonus payment to such service provider to expand capacity to provide effective training;
2. A strategy for independently validating the achievement of the performance; and
3. A description of how the State or local board will reallocate funds not paid to the provider because the achievement of performance did not occur for further activities related to such a procurement strategy.

Primary occupation: The customary work for which the dislocated worker's training, experience, or work history qualifies them.

Public assistance: As defined in section (3)(50) of WIOA, federal, state, or local government cash payments for which eligibility is determined by a needs or income test. This includes temporary assistance for needy families (TANF), the supplemental nutrition assistance program (SNAP), and supplemental security income (SSI).

Self-sufficiency: Per section 134 (a)(3)(A)(xii) of WIOA and 20 C.F.R. 680.140(b)(6), an economic standard that specifies the income needs of families, by family size, the number and ages of children in the family, and local area geographical considerations.

Registered apprenticeship program: A program meeting Federal and State standards of job preparation that combines paid on-the-job training and related instruction to progressively increase workers' skill levels and wages.

Transitional jobs: A time limited work experience that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history, as determined by the local WDB. These jobs are designed to enable an individual to establish a work history, demonstrate success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.

VI. Local Workforce Development Area Requirements

A. Evaluate Appropriateness to Receive Training Services

The local WIOA Title I program staff (WIOA staff) must determine the appropriateness of a participant to pursue a program of training services. It is important that WIOA staff gather enough information to justify the need for training services. The participant case record must contain a determination of need for training services through the following determination process.

1. Conduct Interview, Evaluation or Assessment, and Career Planning

Pursuant to section 134(c)(3)(A) of WIOA, training services may be provided to adults or dislocated workers who, after an interview, evaluation, or assessment and career planning, have been determined by WIOA staff or OhioMeansJobs center partner staff to:

a. Be unlikely or unable to obtain or retain employment.

WIOA staff determines the individual is unlikely or unable, by only receiving career services, to retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

There is no requirement that career services be provided as a condition of receipt of training services; however, if career services are not provided before training, the WIOA staff must document the circumstances that justified its determination to provide training services, either after conducting a new interview, evaluation or assessment; or, if appropriate, based on a prior recent interview, evaluation or assessment that was conducted for another education or training program.

b. Be in need of training services to obtain or retain employment.

WIOA staff must determine that the training the individual receives would result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

Individual employment plans (IEP) are one of the most effective ways to serve individuals with barriers to employment and to coordinate the various services, including training services they may need to overcome these barriers. Therefore, all participants who receive an individualized career service per WIOAPL No. 15-08.1, Career Services for Adults and Dislocated Workers, or a training service must receive an IEP.

c. Have the skills and qualifications to successfully participate in the selected program of training services.

WIOA staff must determine, through evaluation or assessment of the individual, that the individual has the skills and qualifications to successfully participate in and complete training.

The local WIOA staff shall, where appropriate, utilize previous assessments when making training determinations to reduce duplicate assessment and develop enhanced alignment across partner programs. The local WIOA staff determines when it is appropriate to use a recent assessment (within 6 months) of the participant conducted pursuant to another education or training program. This may include assessments completed by a secondary school, postsecondary school, WIOA Title II program (which in Ohio is known as Aspire), WIOA Title III program (Wagner-Peyser Employment Services), WIOA Title IV program (vocational rehabilitation), Veteran Services Program, or other education or training providers.

d. Be unable to obtain grant assistance from other sources to pay the costs of such training or require WIOA assistance in addition to other sources of grant assistance.

WIOA staff must coordinate training funds available and make funding arrangements with OhioMeansJobs center partners and other entities. Staff must consider the availability of other sources of grants to pay for training costs such as Temporary Assistance for Needy Families (TANF), State-funding, and Federal Pell Grants, so that WIOA funds supplement other sources of training grants.

WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of such training or require assistance beyond what is available under grant assistance from other sources. WIOA funds may be used in instances where other sources of training grants do not cover the cost of the training. When determining whether additional assistance beyond

grant assistance from other sources is needed, WIOA staff may take into account the full cost of participating in training services, including the cost of supportive services and other appropriate costs.

A participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the WIOA staff has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the local area the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including education fees the training provider charges to attend training. Reimbursement is not required from the portion of the Pell Grant assistance disbursed to the participant for education-related expenses.

- e. Be members of a worker group covered under a petition for Trade Adjustment Assistance (TAA) who are awaiting a determination.**
- f. Be determined eligible and are members of a priority population if training services are provided through the WIOA adult program.**

WIOA focuses on serving individuals with barriers to employment and seeks to ensure access to quality services to these populations.

WIOA also establishes a statutory requirement. Priority for training services funded by and provided through the WIOA Adult program shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient, so that they can receive the training services that have been determined to be needed to obtain or retain employment. The emphasis in WIOA is to prioritize services to those individuals who have the most barriers to employment and to provide those individuals with the opportunity to benefit from employment and training services. Priority must be implemented regardless of the amount of funds available to provide services in the local area.

For both the Adult and Dislocated Worker Programs, the Jobs for Veterans Act, Public Law 107-288 establishes priority of service for veterans and eligible spouses. Veterans and eligible spouses must first meet any and all of the statutory eligibility criteria in order to be considered for: a) enrollment in the program; b) receipt of priority for enrollment in the program; and c) priority of receipt of services. Priority means that veterans and eligible spouses take precedence, with all other qualifying eligibility requirements being equal, over non-veteran and eligible spouses in obtaining services and program enrollment.

WIOAPL No. 15-08.1 and WIOAPL No. 15-20.1, Priority of Service for Veterans and Eligible Spouses, provide additional guidance for providing services to these priority populations.

g. Have selected a program of training services that is directly linked to a state in-demand occupation.

Training services provided shall be directly linked to an in-demand industry sector or occupation or one with a high potential for sustained growth in the local workforce development area (local area) or planning region, or in another local area to which an adult or dislocated worker receiving such services is willing to relocate. Refer to WIOAPL No. 15-11.1 for the guidelines on the selection of state in-demand occupations and local in-demand occupations

2. Determine Economic Self-Sufficiency

Pursuant to section 134 (c)(3)(A)(i)(I) of WIOA, for adults and dislocated workers to receive training services, they must need such service to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

Local WDBs must determine criteria for economic self-sufficiency. The determination as to what constitutes economic self-sufficiency may vary by local area and the local economy, so this flexibility allows local WDBs to tailor their services in a way that works in their local economy.

Resources are available to assist in the determination of economic self-sufficiency for local areas. The Ohio Association of Community Action Agencies (OACAA) provides a self-sufficiency calculator by county for the state (oacaa.org).

For working dislocated workers, the determination of economic self-sufficiency requires a two-step assessment of the worker's employment:

- a. Determine if the employment is "interim employment."
- b. If the employment is not "interim," determine if the wage is at least the locally defined level of self-sufficiency or if the hourly wage is comparable to or higher than wages from previous employment.

It should be noted that workers who have received notice of layoff, but have not yet been laid off and who do not have any other sources of employment are not subject to review of economic self-sufficiency.

Interim Employment for Dislocated Workers

Typically, employment is considered interim if the salary is below the salary of the dislocated worker's primary occupation and/or if the dislocated worker is working under the skill level of his or her customary occupation. There may be circumstances where interim employment

does provide a sufficient wage temporarily but is not considered permanent employment that leads to economic self-sufficiency (e.g., working through a temporary agency). The determination about whether a dislocated worker's employment is interim employment must be made on a case-by-case basis and take into consideration the dislocated worker's personal, family, financial, and employment situation.

A dislocated worker who is in interim employment is not considered to be self-sufficient even if the hourly wage exceeds the lower living standard income or if the hourly wage is comparable to or higher than the wages from previous employment.

If a dislocated worker has interim employment, this participant is considered unemployed at participation and information should be entered into the Ohio Workforce Case Management System (OWCMS) as such.

Wage Standard for Non-Interim Employment for Dislocated Workers

Employed dislocated workers whose wages are over the locally defined economic self-sufficiency standard or comparable to or higher than the wages from previous employment are considered economically "self-sufficient," unless the employment is considered "interim employment." Dislocated workers who are determined to be economically "self-sufficient" may receive career services only.

Additional Requirements for Adult-Funded ITAs

As part of the determination of the appropriateness for training services, the local area must review "family self-sufficiency" for participants seeking a WIOA adult-funded ITA. WIOA adult-funded ITAs may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that adult participants seeking adult-funded ITAs are those whose families lack or have limited ability to pay for the training and supportive services needed to obtain or retain employment.

Additionally, all young adults, ages 18-24, who are seeking WIOA adult-funded ITAs, must also be screened for dependency status. Refer to WIOAPL No. 15-06, Determination of Dependent Status, for guidance on determining dependency status. If an adult, ages 18-24, is determined to be dependent, "family self-sufficiency" would include the income(s) of all family members, including the young adult's parent(s).

WIOA eligible adults who are over the local standard for "family self-sufficiency" are not eligible for adult-funded ITAs. Other WIOA services may be provided, as appropriate. They may also be served using other WIOA funds, if eligible.

Local WDBs are required to develop the criteria for "family self-sufficiency." The local definition of family self-sufficiency should not be confused with the "self-sufficiency" definition.

Extenuating Circumstances for WIOA Adult-Funded ITAs

If a participant's family income exceeds the "family self-sufficiency" standard, a participant may still receive an adult-funded ITA if extenuating circumstances exist. When evaluating extenuating circumstances, the costs related to the economic hardship must be the responsibility of either that person or that of his or her legal dependent, spouse, or parent. Those costs must be ongoing and expected to cause a financial hardship for the duration of the ITA.

Economic hardships include, but are not limited to:

- a. The portion of medical procedure or prescription medication costs that are not covered by insurance and are ongoing and determined to be medically essential;
- b. Health insurance premium payments that are not paid for by private or public sources;
- c. Payments on past due or back mortgage, rent, or essential services (e.g., electric, water, natural gas, propane, and other utility arrearages) that accumulated because of involuntary unemployment or underemployment;
- d. Court-ordered child support or spousal payments;
- e. Ongoing payments to a nursing home, home health care provider, elder care provider, or assisted living provider; or
- f. Payments toward debt that accumulated due to a natural disaster, severe illness, or disability.

Extenuating circumstances do not include normal rent, mortgage, utility, automobile, fuel, grocery, credit card, or "pay-day loan" payments.

Exceptions may be approved on a case-by-case basis for individuals whose family income exceeds the family self-sufficiency standard. Documentation explaining the extenuating circumstances must be maintained in the participant file, along with the signature approval of the local WDB Fiscal Agent and WDB Director or designee.

3. Informed Customer Choice

Training services shall be provided in a manner which maximizes consumer choice in the selection of an eligible provider of such services. Each local WDB, through the OhioMeansJobs centers, shall make available the list of eligible providers of training services and accompanying performance information. Based upon the available

information, participants, with the assistance of the local area, are able to make informed customer choices.

VII. Reporting Requirements

Program participation begins when the participant is determined eligible, receives the staff-assisted basic career service, individualized career service, or training service which is funded by the adult or dislocated worker program. Pursuant to rule 5101:9-30-04 of the Administrative Code, the local board shall ensure the timely (i.e., within 30 days) and accurate reporting of WIOA participants, services, case management activities, and performance information, using the Ohio Workforce Case Management System (OWCMS).

VIII. Monitoring

At the local level, the local area must conduct oversight of the implementation of the WIOA adult and dislocated worker programs to ensure that participants are enrolled in the programs and have been provided identified services.

Through the state's monitoring system, program monitors will review the local area's implementation of the WIOA youth program, including a participant file review, during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process.

IX. Technical Assistance

For technical assistance, you may send your request to the Office of Workforce Development: WIOAQNA@jfs.ohio.gov.

X. References

Workforce Innovation and Opportunity Act §134, Pub. L. 113-128.

Jobs for Veterans Act, Pub. L. 107-288.

20 C.F.R.. §§ 680.200-230, 680.300, 680.320-680.340, 680.420, 680.470, 680.600, 680.650-660, and 683.500-683.510.

29 U.S.C. 3101 et seq.

O.A.C. 5101:9-30-04.

USDOL, Training and Employment Guidance Letter WIOA No. 41-14, Workforce Innovation and Opportunity Act (WIOA or Opportunity Act) Title I Training Provider Eligibility Transition, (June 26, 2015).

USDOL, Training and Employment Guidance Letter WIOA No. 13-16, Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA), (January 12, 2017).

USDOL, Training and Employment Guidance Letter WIOA No. 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Services (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules, (March 1, 2017).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-06, Determination of Dependent Status, (July 15, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-08.1, Career Services for Adults and Dislocated Workers, (June 6, 2017).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-11.1, Use of Individual Training Accounts, (TBD).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-12, Work Experience for Adult and Dislocated Workers, (July 15, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-20.1, Priority of Service for Veterans and Eligible Spouses, (August 18, 2017).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-22.1, On-the-Job Training Policy, (TBD).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-23, Incumbent Worker Training (IWT) Guidelines, (March 29, 2016).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-24, Customized Training Guidelines, (March 23, 2016).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 16-02, Eligible Training Providers, (November 10, 2016).