

Technical Assistance Guidance

TAG-13-2017

Issued Date: **Thursday, August 17, 2017**

Subject:
Local Workforce Development Board - Workforce Connections
Policy Implementations Revisions & Updates
Adult, Dislocated Worker – Programs Services and Activities

Purpose

To announce the publication and effective date for implementation of revisions made to Workforce Connections' (WC) policies:

- **ADW-030-01 Eligibility for WIOA Title I Services; and**
- **ADW-030-04 On the Job Training Program (OJT).**

Background

The accuracy and reliability of program reports submitted by states and grantees using Federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity.

The Employment and Training Administration's (ETA) statutory and regulatory authority to administer job training and employment programs includes provisions requiring performance reporting from states and grantees. The Department uses this information to assess performance of states and grantees. All states and direct grantees administering Department of Labor (DOL) employment and training programs must collect and report information on all participants.¹

In order to ensure the accuracy and reliability of reported information, states and grantees are required to validate the data submitted to ETA. Failure to demonstrate the validity of reported data will be deemed to be a failure to report, and subject to corrective action or sanction, as appropriate.

Data element validation assesses the accuracy of program participant data records. Data element validation is performed by reviewing samples of participants records against source support documentation to ensure compliance with Federal established requirements.

References

Workforce Innovation and Opportunity Act (WIOA) P.L. 113-128 Sec. 116
2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards – Record Retention and Access §200.333
20 CFR Subpart A – State indicators of Performance for Core Programs - §677.155
20 CFR Subpart C – Reporting Requirements – §683.300
TEGL 22-15 Program Year (PY) 2015/Fiscal Year (FY) 2016 and PY 2014/FY 2015 Data Validation and Performance Reporting Requirements and Associated Timelines
State Compliance Policy (SCP) 1.14 On-The-Job Training (OJT) and Customized Training (August 2016)

With the commitment to improve processes and after further research and assessment of recently established requirements, WC has revised and implemented the above referenced policies as appropriate.

¹ TEGL 22-15 Program Year (PY) 2015/Fiscal Year (FY) 2016 and PY 2014/FY 2015 Data Validation and Performance Reporting Requirements and Associated Timelines.

WC will continue to provide technical assistance to support the workforce development system. For further information, please contact WC as necessary or required. Sub-recipients must implement revised policies since their program(s) will be impacted by the established requirements affecting WIOA Title I compliance.

Policy ADW-030-01 Eligibility for WIOA Title I Services

The following has been added to the above referenced policy under **Sec. VI (C) (5) (q)**:

- Exclusion for Family Income
Payments received from programs funded under Title V of the Older Americans Act of 1985 [42 U.S.C. §3056(f) e.g., Senior Aides, Senior Community Service Employment Program (SCSEP).

The following has been added on **Sec. VIII – Table**

Data Element Criteria and Source Support Documentation Requirements

U.S. Work Authorization

- New edition of form I-9 “Employment Eligibility Verification” dated 07-01-2017 – OMB No. 1615-0047 expiration date 08-31-2019.

Social Security Number (SSN)

Additional acceptable support documentation added under this category

- Letter from the Social Security Administration Office indicating program participant’s name and SSN
- Copy of W-2 form
- DD-214 form
- Employment records
- Unemployment Insurance records (must show full SSN)

Policy ADW-030-04 On the Job Training Program

Section V has been added to the above mentioned policy

Performance Information

On-the-job training programs are particularly well positioned to help the workforce development system to satisfy the new measures on job retention and effective service to businesses, given its focus on placing program participants into employment, addressing the skilled workforce needs of businesses and encouraging the retention of successful OJT trainees.

A. Consistent with SCP 1.14 the local boards will be responsible for determining whether training providers meet acceptable performance levels, financial and regulatory requirements and the overall effectiveness of the OJT contract. Providers of on-the-job training are not subject to the requirements applicable to entities listed on the State list of eligible training providers.

B. WC must collect performance information on providers of on-the-job training programs.

At a minimum collected performance information should include:

1. Data on placement of trainee at the end of OJT program;
2. 2nd and 4th quarter retention rates;
3. Rate of successful completion of OJT programs; and
4. Wages of OJT trainees and wages after OJT program ends.

Action: Please share this information with all staff and other interested parties.

WC Policies can be located at: <http://nvworkforceconnections.org>