

CareerSource Heartland

SECTION: Administration	PROCEDURE # A25	1 of 7
TITLE: Individual Training Accounts, Training Provider and Program Approval and Renewal	EFFECTIVE DATE: 04/20/2016	
APPROVED BY: Donna Doubleday	REPLACES 01/05/2015, PLN 01-04	

PURPOSE: To provide guidelines for determining initial and subsequent eligibility of training providers and programs for inclusion on CareerSource Heartland's (CSH) Eligible Training Provider List (ETPL). Approved providers and programs are eligible to receive Workforce Innovation and Opportunity Act (WIOA) funds for the provision of training services in local areas.

BACKGROUND: WIOA mandates that training services for eligible Adults and Dislocated Workers be provided through approved training providers. WIOA emphasizes informed consumer choice, job-driven training, provider performance, and continuous improvement, and dictates that Local Workforce Development Boards (LWDB) are responsible for approving training providers and programs for inclusion on the local ETPL. Training Provider listings serve as the catalyst for establishing approved occupational training programs in DeSoto, Hardee, Highlands and Okeechobee counties.

Note: Providers of work-based training opportunities are not required to be included on the local ETPL.

PROCEDURE

CSH utilizes Individual Training Accounts (ITA) to provide training services to eligible residents within the CSH area. ITAs are the mechanism under WIOA for providing eligible customers with the resources to access training programs through approved training providers. To be eligible for an ITA, an individual customer must, at a minimum:

- Be determined as not meeting local self-sufficiency standards, and be unable to find suitable employment with existing skills and/or academic credentials, as evidenced through unsuccessful job placement;
- Not be eligible to receive other training assistance (i.e. Pell grant) or, if received, the additional funding is not sufficient to cover training and training related support costs;
- Through assessment, be determined to be appropriate for and able to complete and benefit from the chosen employment training program and be identified by designated staff as in need of training assistance;
- Select a training program that is linked to a demand occupation in the local area and make a commitment to seek employment in the field once trained.

Priority for ITAs is given to vocational and technical programs lasting not more than twelve (12) consecutive calendar months. However, consideration is given to those programs not lasting more than twenty-four (24) consecutive months, including those instances of customers having current academic credit. In no instance will CSH fund all four (4) years of a customer's post-secondary education. Baccalaureate level training must have prior approval by the CSH President/Chief Executive Officer (CEO). Funding for education and training beyond the baccalaureate level is limited to certifications. Exceptions to these limitations require the prior approval of the CSH President/CEO.

All entities wishing to be added as a Training Provider to the local ETPL must complete a Training Provider Application Packet. CSH staff will review the potential Training Provider's application information to assure compliance with federal, state, and local criteria.

All training agreements must comply with contracting requirements as detailed in the CareerSource Florida's (CSF) Contracting Policy.

The lifetime threshold for allowable investment is \$5,000 per customer for training in targeted industry occupations, and \$4,000 per customer for training in non-targeted industry occupations. Exceptions to this threshold may be approved by the President/CEO of CSH, upon presentation of good cause and individual need. Exceptions must be approved in advance. The thresholds do not include supportive services required for participation in training.

Short term training opportunities may also be provided through the ITA process. Short term training must result in a recognized credential as defined by WIOA guidelines. All approved training must be in occupations listed on the Targeted Occupations List (TOL) except in circumstances surrounding special grants or involving targeted populations. All requests to fund training for occupations not listed on the TOL must be approved in advance by the CSH President/CEO.

Training Providers eligible to provide training services prior to the effective date of this procedure may continue to provide services during the transition period, but must apply for “Continued Eligibility” and be approved prior to June 30, 2016.

Initial Inclusion of Training Providers

Occupational skills training providers are procured through a competitive procurement and negotiation process in order to qualify for vouchers under the ITA system. At a minimum, CSH uses the following considerations in developing a prospective vendor list for the purpose of determining an eligible occupational skills training provider:

- Effectiveness of the training provider in delivering comparable or related training based on demonstrated performance, in terms of the likelihood of meeting performance goals, cost, quality of training and service to targeted customers.
- Willingness of the training provider to enter into agreements, establish linkages with other appropriate human service agencies and provide discounted tuition or offer scholarships as evidenced by such activities as the on-site availability of no-cost mentoring, tutoring and placement services, aggressive cooperation with CSH staff to access the institution’s own grants-in-aid offerings and waiving of costs associated with selected fees and similar supports.
- Availability of occupational skills training programs which provide a level of skills sufficient to meet the demands of the local labor market.

In addition, to be approved, Providers must be:

- An institution of higher education and provide a program(s) that lead to recognized post-secondary credential; or
- An entity that carries out apprenticeship programs registered under the National Apprenticeship Act (NAA); or
- Other public or private providers of training service programs which may include joint labor-management organizations, pre-apprenticeship programs and occupational/ technical training; or
- A provider of adult education and literacy under Title II if such activities are provided in combination with occupational skills training.

Only entities that carry out NAA registered apprenticeship programs are exempt from “Initial” and “Continued” eligibility application procedures. NAA programs will be included and maintained on the ETPL as long as the corresponding program remains registered or until it notifies CSH in writing that it no longer wants to be included.

Non-exempt new providers must apply through the “Initial Eligibility” process. “Initial Eligibility” may be received for only one year, after which these providers may seek “Continued Eligibility.”

To be eligible to receive training funds, with the exception of registered apprenticeship training providers, training provider programs must be for training in occupations on the Local Workforce

Development Area (LWDA) TOL, current at the time of training.

Note: Out of state training institutions not operating in the State of Florida and not required to be licensed by the Florida Commission for Independent Education must provide information as outlined in Attachment 2 of CSF Administrative Policy number 90.

Initial Eligibility

To be determined Initially Eligible to provide training services, the provider shall supply verifiable program-specific performance information to support the provider's ability to serve participants, accompanied by relevant performance and cost information in order to maximize consumer choice as well as serve all significant population groups. Such information shall include:

- Verification of provider's current Florida licensing, certification, or otherwise recognized accreditation authorizing the entity to provide training services in Florida
- A detailed description of each training services program the applicant intends to provide
- Information on the program costs of each program the applicant intends to provide (these costs should include all costs related to the program, including tuition, books, lab fees, supplies, application fees, exam fees, test fees, etc.)
- Information on the industry-recognized credential, including post-secondary credential, to be received upon completion for each program offered, and whether the credential can be stacked with other credentials as a career ladder/pathway sequence
- Identification of specific partnerships or collaborations the provider has established with business or industry
- Identification of the in-demand sectors and occupations which best fit with the training program
- A description of the prerequisites or skills and knowledge required prior to commencement of training
- Verification that the training program is for an occupation on the local TOL
- Demonstration of a minimum of 85% completion rate for enrollees of programs submitted
- Demonstration of a minimum of 85% entered employment rate for enrollees of programs submitted
- Demonstration of a minimum entry level wage rate of \$14.00/hr. for participants entering employment for each program submitted
- Provision of progress and performance data for each program submitted
- Timely reporting of student data to FETPIP
- Demonstration of reasonableness of cost

Training Providers that do not meet the minimum criteria as delineated throughout this procedure will not be approved. Proposed programs that do not meet the minimum criteria as outlined in this procedure will not be approved. Training Providers are advised that the same program(s) approved for some LWDA's may be denied by other LWDA's based on local criteria or need. Only approved Training Providers and Training Provider Programs will be listed on the local ETPL.

Applications submitted by Training Providers not eligible to receive Title IV funds may be denied if the cost of submitted programs is deemed unreasonable in comparison with other locally available options.

Favorable consideration is given to institutions eligible to receive Title IV funds and/or who offer scholarships or funding waivers to WIOA participants; and to institutions who agree to provide all required supplies, uniforms, and required exams through their internal processes, and to bill CSH directly for those items, thus eliminating third party billing.

Invitations to submit Training Provider applications are sent to all current providers as well as any known public or private providers located in the LWDA and surrounding counties. Training Providers may apply at any time by request.

Favorable consideration is given to programs in which the majority of enrollees complete training, earn a credential, and enter training related employment; and to programs in which participants entering employment earn equal to or higher than the locally adjusted Lower Living Standard Income Level (LLSIL).

FETPIP data is required on all programs that have been in active operation for a duration long enough to require such reporting. However, the Training Provider may also provide internally collected program performance data if such is available.

Continued Eligibility

All Training Providers who have completed the “Initial Eligibility” for at least one year or who were eligible to provide training services prior to the effective date of this procedure may apply for “Continued Eligibility.” All eligible Training Providers under this category must submit applications every two years to maintain their eligibility. With the exception of the initial implementation of this procedure, applications for “Continued Eligibility” must be submitted three months before eligibility expires. Removal from the ETPL for a short period of time will not return the Training Provider to “Initial Eligibility” status unless the Training Provider was removed for cause (see Enforcement section).

“Continued Eligibility” applicants must supply the following information:

- Verification of provider’s current Florida licensing, certification, or otherwise recognized accreditation authorizing the entity to provide training services in Florida. (A Training Provider eligible to provide training services prior to the effective date of this procedure is exempt from providing this verification unless its license, certification, or authorization status has changed since last application).
- For each program the applicant intends to provide/has been providing:
 - Total number of persons enrolled in the program
 - Total number of CSH participants enrolled in the program
 - Total number of persons completing the program
 - Total number of CSH participants completing the program
 - Total number of persons awarded a recognized industry or post-secondary credential
 - Total number of CSH participants awarded a recognized industry or post-secondary credential
 - Total number of persons employed after completing the program
 - Total number of CSH participants employed after completing the program
 - Average wage rates of persons employed after completing the program
 - Average wage rates of CSH participants employed after completing the program
 - Information on the program costs of each program for participants completing the program (these costs should include all costs related to the program, including tuition, books, lab fees, supplies, application fees, exam fees, test fees, etc.)
 - Information on the industry-recognized credential, including post-secondary credential, received upon completion, and whether the credential can be stacked with other credentials as a career ladder/pathway sequence
 - Description of how the Training Provider ensures access to training services programs throughout the state and through use of technology
 - Description of how the training programs serve individuals who are employed

- Description of how the training programs serve individuals with disabilities and other barriers to employment
- Information reported to State agencies with respect to Federal and State training services programs
- Description of how program(s) meet the needs of local employers and participants
- Completed program expense sheets for all programs submitted for continuation or approval

CSH will use this information to ensure provider accountability and informed consumer choice; to ensure that Training Providers and programs are meeting the needs of local businesses and residents; and to evaluate performance.

CSH requires the following for continued program eligibility. Training Providers and programs will be evaluated separately. Training Providers may receive approval for “Continued Eligibility” status while all programs submitted may not be approved. For program approval, CSH will consider the following:

- Information on the program costs of each program the applicant intends to provide (these costs should include all costs related to the program, including tuition, books, lab fees, supplies, application fees, exam fees, test fees, etc.)
- Information on the industry-recognized credential, including post-secondary credential, to be received upon completion for each program offered, and whether the credential can be stacked with other credentials as a career ladder/pathway sequence
- Identification of specific partnerships or collaborations the provider has established with business or industry
- Identification of the in-demand sectors and occupations which best fit with the training program
- Prerequisites or skills and knowledge required prior to commencement of training
- Verification that the training program is for an occupation on the local TOL
- Demonstration of a minimum of 85% completion rate for enrollees of programs submitted
- Demonstration of a minimum of 85% entered employment rate for enrollees of programs submitted
- Demonstration of a minimum entry level wage rate of \$14.00/hr. for participants entering employment for each program submitted
- Provision of progress and performance data for each program submitted
- Timely reporting of student data to FETPIP
- Demonstration of reasonableness of costs submitted
- Percentage of program participants who enter unsubsidized employment in an occupation related to their training
- Percentage of program participants who are in unsubsidized employment during the second and fourth quarters after exit from the program
- Median earnings of program participants who are in unsubsidized employment during the second quarter after program exit
- Percentage of program participants who obtain an industry or post-secondary recognized credential (or a secondary school diploma if same participants have obtained or retained employment or are in an education/training program leading to a post-secondary credential within one year after program exit)

Concerning provision of information on program outcomes for approved programs, Training Providers receiving approval for “Continued Eligibility” status are subject to all requirements for the programs

approved even after “Continued Eligibility” expires (to report outcomes for the approved program year(s)).

Exceptions

Exceptions to the required use of the ETPL for ITA funded training include work-based training (on-the-job, employed worker, customized, incumbent worker, internships, paid or unpaid work experience, and transitional employment) opportunities. Although an additional exception can be made where a local board determines there is insufficient number of eligible providers to accomplish the purpose of an ITA, at this time this is not appropriate for CSH. For work-based training, a contract will be used to provide training.

Under the circumstances of youth contracts, special grant funding, or due to local economic climate and jobs availability, CSH President/CEO may waive the credential, entered employment, completion, TOL, and/or employment wage rate requirements. Waivers must be granted in advance.

Enforcement

As CSH is made aware of issues or possible issues occurring in reference to a Training Provider, due diligence will be used to verify the validity and potential impacts. Depending on the nature and/or number of concerns brought to our attention, further action may be taken, up to and including, removal of the Training Provider from the EPTL.

Training Providers will be removed from the local ETPL for failure to comply with this procedure, CSF’s Administrative Policy number 90, WIOA, State of Florida and/or local area requirements, when the training program is no longer needed or desired, or for “cause”. “Cause” shall include, but not be limited to, engaging in fraud or other criminal acts, incapacity, unfitness, neglect, incompetence, irresponsibility, misfeasance, malfeasance, nonfeasance, or lack of performance.

Training Providers will be also removed from the local ETPL for supplying inaccurate information, for offering unlawful remuneration to attract participants, and upon determination that the Provider substantially violated a requirement of this or any related Federal, State, or local area requirements. “Substantial violation” may be construed to be one or more egregious violations in a short period of time, or numerous minor violations over a longer time period.

Training Providers who are removed from the local ETPL for “Enforcement” reasons shall be terminated from the ETPL and ineligible to receive funds under Chapter 3 (section 122(f)(1)(B) WIOA) for a period of not less than two years. A Provider removed for “Enforcement” reasons shall lose “Continued Eligibility” status and will need to reapply for “Initial Eligibility” before being allowed to provide services. In this instance, the Provider will need to supply additional information verifying correction of the issue(s) that caused removal.

A Provider whose eligibility is terminated shall be liable for the repayment of funds received under Chapter 3 (section 122(f)(1)(C) WIOA) during the period of violation.

Remedies and penalties described herein shall not supplant civil and criminal remedies specified in other provisions of law.

A Training Provider determined no longer eligible for inclusion on the local ETPL listing will be notified within ten (10) working days of the decision. In an effort to minimize any negative impact to individuals approved for and participating in training at the time of this decision, CSH will continue to provide previously agreed upon ITA funds through their program completion. However, no new students will be approved for enrollment.

Local Approval Process

The local process for approving Training Providers and programs is posted to the CSH website for public review. Updates will be made to the website as changes to processes occur.

Upon receipt of applications, CSH will review all information presented and compare against the required criteria. If the Training Provider Agreement is approved or renewed, all submitted programs will be reviewed. Programs continuing to meet minimum requirements will be approved or renewed. Training Providers and programs meeting minimum requirements will be approved or renewed. If a Training Provider is not approved or renewed, programs submitted by that Training Provider will not be approved or renewed. Programs failing to meet any of the minimum requirements noted above will not be approved or renewed. Reasonable efforts will be made to work with Training Providers to promote continued eligibility of any and all possible training programs.

Training Providers will be notified of decisions on all programs submitted within ten (10) working days of the date of decisions. In an effort to minimize any negative impact to individuals approved for and participating in training at the time of this decision, CSH will continue to provide previously agreed upon ITA funds through their program completion. However, no new students will be approved for enrollment.

Until DEO and CSF create the planned single, online resource for Training Providers to submit applications, CSH will maintain its local ETPL on its website, and, if available and as appropriate, on the State's data system. Updates will be made to the website as changes to the ETPL occur.

At its discretion, CSH may utilize a Training Provider/program that is approved elsewhere in Florida but has not applied to this LWDA, if the Provider/program meet CSH's needs and criteria. In this instance, CSH will request a copy of the Provider's application from the approving LWDA. The information submitted will be reviewed according to the processes and criteria outlined in this procedure.