

Workforce Development Board

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UPPER SAVANNAH WDA INSTRUCTION NUMBER: PY'17-12

TO: Upper Savannah Grantees

ISSUANCE DATE: May 8, 2018

EFFECTIVE DATE: Immediately

SUBJECT: Policy for Approving Training Programs

REPLACES: PY 15'04

Background: The Workforce Innovation and Opportunity Act (WIOA) requires training providers to apply for approval as an eligible training provider to receive WIOA occupational training funds. The Statewide List of Certified Training Providers includes all training programs certified by one or more Boards. Inclusion on the state list is not an endorsement from the SC Department of Employment and Workforce (SCDEW) of that program or provider.

Process for Approval:

Training Providers must first complete the state application process with SCDEW before they can be considered for local approval (<https://scpath.org/>). Upon receipt of completed application and program data, SCDEW does an initial review. The state application allows program providers to indicate what geographical area they wish to serve. Local areas are notified when a program application has completed the submission process and requests local approval. Local areas will review the data submitted to the state.

Through the years, the Upper Savannah Workforce Development Board has adopted policies. Upper Savannah staff uses the pre-established criteria to make determinations regarding inclusion on the local list.

This document does not include all of the definitions or instructions listed in the state process. It summarizes some key provisions and describes local practices, which supplement the state policy.

Criteria for Local Approval:

Training Providers

1. Has completed the application submission process to be placed on the SC Eligible Training Providers list.* (More information regarding items marked with an "*" is included on page 3, #3.)

2. Is licensed by appropriate entity such as the SC Commission on Higher Education or is a registered apprenticeship.*
3. Must have been in operation at least two years.*
4. Is nationally or regionally accredited by a regulating body recognized by the US Department of Education, or where programmatic accreditation is not available for a course of study, the provider must be able to issue an industry recognized and portable credential to participants completing the course.*
5. Offer training in a facility which is in compliance with ADA requirements and be able to pass a site visit.
6. Has a physical location within South Carolina, North Carolina or Georgia.*
7. Offer training within 60 miles of the outside radius of the Upper Savannah Workforce borders.***(See page 3, #4). Exceptions to this rule may be made for truck driver training schools that offer housing. Also, Upper Savannah may approve a school outside of the radius if it has a request from a WIOA applicant or client who has made arrangements to commute or obtain lodging.
8. The organization and/or its principals is not on the federal debarment list.*
9. The school has adequate facilities, equipment and staff for students to be able to complete training. Upper Savannah reserves the right to visit any training vendor to ensure that the school correctly represented itself on the application. If the school is too far away to visit, Upper Savannah may call the workforce area where the provider is located to get a reference.

Eligible Training Courses:

1. Must be for an in-demand occupation for the Upper Savannah region and must lead to a self-sufficient wage as defined by WIOA performance guidelines. (See attachment for most current list.)*
2. Students must be able to complete training and earn a recognized credential within two years. *
3. Should be recognized by local employers as adequate preparation for selected career. Upper Savannah may contact employer references supplied by applicant. Also, Upper Savannah may contact additional employers to receive feedback on the value of training.
4. Training programs which prepare workers for skilled trades (such as machine tool, automotive technology and HVAC) and which prepare workers to be healthcare providers (such as registered nursing, paramedic) must have hand-on instruction so students can learn by guided practice. An exception is refresher courses designed to help a student pass a licensing exam.*

Renewal of Inclusion on State and Local Lists

1. Providers and programs must be re-evaluated each two years according to policies developed by SCDEW and listed in the state policy.

2. The program must submit information to SCDEW annually so that performance data can be calculated. It is not expected that data will be available until after Program Year 2018. Once performance information is available, programs must meet local pre-determined goals.

Revocation of Inclusion on Lists

1. Providers and programs may be removed if relevant information from the application changes or is found to be erroneous.
2. If an occupation is removed for the area's list of in-demand careers, programs will be removed. Existing trainees will be grandfathered.
3. Providers and programs may be removed if there appears to be a pattern of complaints and the school cannot resolve grievances filed by WIOA-funded students.

Appeals Process

1. When it is determined that a program does not meet criteria for inclusion, the provider is notified in writing and the reason(s) for denial will be cited. If it appears the denial was due to an error in the application (for example the length of training was listed as 200 months rather than 20 months), the application can be amended and resubmitted.
2. Denials which were based on the judgement of Upper Savannah staff may be appealed. For example, if staff felt that there was not sufficient equipment to train students, that part of the determination could be appealed.
3. The Upper Savannah Workforce Board will not hear appeals for criteria which are factual and based on previously established board policy. For example, if it is proposed that photography be offered, and photography is not on the region's list of in-demand training, an appeal hearing will not be scheduled. The criteria which are starred with a single asterisk symbol "*" are not eligible for an appeal hearing.
4. For the sake of expediency, Upper Savannah may initially exclude organizations which are outside a 60-mile radius from the borders of the Upper Savannah region. If a school identifies a potential student who might be served through Upper Savannah, the application will be re-evaluated upon request. This criteria is identified in the section above marked with a double asterisks ("**").
5. The area will build data on performance history. In the future, there will be state and local requirements for performance. During the initial transition period, organizations may be able to appeal local termination due to poor performance.
6. An organization can appeal if it feels that Upper Savannah's determination and/or policies violate federal or state laws or regulations.

7. If an organization wants to file an appeal for either an initial denial or a subsequent removal from the list, it should be filed in writing within 30 days of the receipt of the denial notice. The appeal must respond to the criteria that Upper Savannah found to be deficient. The state instruction gives additional guidance on appeals.
8. If an appeal is not filed within 30 days, an applicant's ability to appeal is exhausted. The two exceptions are if the appeal alleges that Upper Savannah's actions violate federal or state laws or regulations and if distance was the only unmet criteria and a client asks the area to reconsider.
9. When an appeal is filed, Upper Savannah will contact the proposed provider within seven days to see if an alternate resolution can be found. If the matter is not resolved to the satisfaction of the applicant, an appeal hearing will be scheduled. The executive committee of the Upper Savannah Workforce Development Board or an ad hoc committee of the board designated by the executive committee will schedule a hearing within 30 days of appeal request. A determination will be made within 30 days of the appeal hearing.

Assurances and Payment Arrangements

1. Individuals participating in WIOA may be issued a training scholarship (voucher) for training based on their needs and abilities. Scholarships have set amounts and are valid for a specific period of time. Students are given an award letter that they can take to the school they select.
2. WIOA cannot pay for costs incurred before a scholarship award letter is issued. Because a debt may prevent a student from obtaining a credential after training, debts have to be resolved prior to WIOA payment.
3. WIOA funding will be used to supplement other types of aid. Students will be required to apply for all applicable aid. Assistance will be applied towards training costs in the following order:
 - a. Pell Grants
 - b. State Grants
 - c. Lottery Funding
 - d. WIOA Scholarships

Students are not awarded WIOA funds if other aid covers all required costs.

4. The school will provide records showing all expected financial aid and the actual aid received. The information supplied to WIOA will also show if students took a loan.
5. If the projected costs are anticipated to exceed the sum of all financial assistance, the client must pay the estimated balance before WIOA funds are used. For example, if training costs \$10,000 and WIOA awards the student \$6,000, the client must pay \$4,000 out of pocket before WIOA funds will be used.
6. WIOA will pay up to the published cost for training. It is the responsibility of the school to keep financial information in the Eligible Training Providers list accurate. WIOA will follow the

school's written policies on refunds and withdrawals unless an alternate agreement is mutually agreed upon.

7. WIOA pays costs as they are incurred. For example, tuition for a four semester training program will be paid for each semester separately.
8. Student progress is monitored. Schools are required to share information on attendance and grades. If a student is not making adequate progress, funding will be discontinued.
9. The Upper Savannah region has a policy of withholding a portion of payment for fixed priced training programs. This applies to programs which cost more than \$4,000 which have a one-time cost for tuition at the start. WIOA will pay enrollment costs (application fees, drug screens, etc.) when a student starts approved training. After the first week of class, Upper Savannah agrees to pay half (50%) of the published training cost. A fourth is paid when the client obtains a credential and the remainder is paid when the client starts working. Documentation is necessary for payment. Upper Savannah will notify providers if their programs are subject to the tiered payment system.
10. Schools must abide by federal, state and local laws and regulations.

Questions regarding this instruction should be directed to the Workforce Development Staff at 864-941-8050.



Ann Skinner
Workforce Development Director

UPPER SAVANNAH COUNCIL OF GOVERNMENTS

Attachment

Upper Savannah WDB Approved Training Programs

- Accounting
- Automotive Technology
- Basic Machine Operations
- Business - General
- Business Management
- Cardiovascular Technology
- Certification in Production & Inventory Management
- Civil Engineering Technology
- CNC - Computerized Numerical Control
- CNC Programmer
- Computer Networking Technology
- Computer Programming
- Computer Technology
- CSRA Electrical JATC
- Diesel Engine Performance
- Diesel Equipment Technology
- Electrical Maintenance
- Electronics Engineering Technology
- Emergency Medical Technology
- Engineering Graphics Technology
- Heating Ventilation and Air Conditioning
- Heavy Equipment Operator
- Industrial Electricity - Electronics
- Industrial Electronics Technology
- Industrial Maintenance Technician
- Lean Six Sigma Black Belt
- Lean Six Sigma Green Belt
- Machine Tool Technology
- Mechanical Engineering Technology
- Mechatronics Technology
- Microsoft Network Technician
- Nursing
- Paramedic
- Project Management
- Radiologic Technology
- Radiological Control Technician
- SCMC Program SC Manufacturing Certification
- Surgical Technology
- Truck Driver Training
- Welding