

TENCO WORKFORCE DEVELOPMENT BOARD NEED TO TRAIN (TRAINING ASSESSMENT CRITERIA) PROCEDURE

Purpose

To ensure consistency when determining a customer's need to train criteria.

Procedure

The following procedure shall be used as guidance when determining the need to train a WIOA adult, dislocated worker, and/or youth. The need for training must be justified prior to enrollment in an occupational training service.

Note: KEE Suite may require you to answer the Need to Train questions regardless of the anticipated service type. However, justification as described in this procedure is specifically for occupational training services.

General

WIOA Regulations state that training services shall only be made available to employed and/or unemployed individuals who ***after an interview, assessment, and/or evaluation and career planning*** are determined to need training to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment and ***have the ability to successfully participate and complete the training service***.

Interview, Assessment, and/or Evaluation

The process(es) used (interview, assessment, and/or evaluation) and information gathered must be noted in KEE Suite. The interview, assessment, and/or evaluation may be conducted at different intervals but must be completed prior to awarding funding and must, at a minimum, include the following:

- The applicant's basic information (living situation, household information)
- Employment history
- Educational background
- Strengths/Obstacles
- Basic Skill Assessment (policy 20)
- Customer's goals
- Referrals made for services (including TABE testing, if applicable)
- Eligibility – category (A, DW, Y)
- Youth – barrier used for eligibility
- Services needed or planned (training, support services, work experience, etc.)

- Activities provided in basic, individualized, and training (if applicable)

Customers should have a case note that reflects the different stages of enrollment: Basic Career Services, Individualized Career Services, and Training. These can be separate case notes or in the same case note if it is differentiated accordingly. All individuals should have at a minimum one item noted that falls within each category (Training – only if applicable).

Basic Career Services includes the following:

- ☐ General Intake
- ☐ Labor Market Information
- ☐ Referrals to Partners
- ☐ Orientation of WIOA Services
- ☐ Eligibility Process

Individualized Career Services includes the following:

- ☐ Work-Based Learning
- ☐ In-depth Interview and Assessment
- ☐ Out-of-Area and/or Relocation Assistance (DW)
- ☐ Support Services
- ☐ Development of the Employment Plan
- ☐ Case Management
- ☐ Youth Elements except Training.

Training Services includes the following:

- ☐ Occupational Skills Training
- ☐ On-the-Job Training

Six Criteria for Need to Train (Training Assessment Criteria in KEE Suite)

The following procedure specifically addresses the “need to train” criteria which can be part of the interview/assessment and eligibility determination. Details of the

need to train must be included in the service tab, in notes, and documentation uploaded in documents. The uploads must be clearly named.

There are six criteria that must be met and documented in KEE Suite *prior* to enrolling a customer in occupational skills training.

1. Is suitable employment available?

Consider whether employment is within a reasonable commute area. Also take into consideration the customer's current skill set, experience, and educational background.

Definitions:

Commute area is defined as 50 miles from their residence.

A **marketable skill** is defined as a post-secondary credential (certificate, diploma, license, or degree) or three years' experience within the last five years in a high-demand field (defined by the TENCO WDB). Credentials earned as a pre-requisite or as part of a career pathway is not to be included as a marketable skill. Example: C.N.A.

Process to Determine Suitable Employment:

- a. **Individuals with a marketable skill** must *document* their **inability** to work in their current field to meet criteria one. This can be due to circumstances such as health, job stability has changed in the current occupation, hours available for work are no longer possible due to changes in family situation, credential is expired and/or outdated. Customers who have a marketable skill as defined above, but simply want to change their career field **do not** meet criteria one.
- b. Examples of documentation for individuals with a marketable skill who seek training funds may include:
 1. Health – Document from Vocational Rehabilitation, Doctor, or detailed self-attestation (verbal or written) describing how the health condition affects their ability to work in the high demand occupational in which they are credentialed or have a work history.
 2. Job stability has changed in the high demand occupation in which they are credentialed or have a work history – KY Stats data on projections and/or other economic development conditions (such as a layoff) indicating a decline in the need of workers with the customer's skill set.
 3. Hours available for work have changed – self-attestation on the reason why they can no longer work the hours typical for the type of job in which they are credentialed or have work history. An Indeed job search should be conducted to see if other possible employment opportunities are available with different shifts/hours.
 4. Credential is expired or outdated – review the date earned and work history under the credential.

- c. To move to the next criteria, the Career Counselor must be able to answer "no" to the first question. If the answer is yes, the customer does not meet criteria one.

2. Are the appropriate trainings beneficial?

Consider and document how the training will assist the customer in being job ready.

- a. The Career Counselor must upload a document that reflects the expected credential earned upon completing the training program. Examples include information from a website, flyer, or school brochure that indicates the credential opportunities for the customer's program of interest.
- b. All training should result in the opportunity to earn a credential.

3. Is there a reasonable expectation for employment following training?

Explain the number of projected annual job opportunities in the local area for the customer's program of study.

- a. There should be a reasonable expectation of employment opportunities following completion of the training. Career Counselors may use the TENCO Occupational Training List to reflect the occupation is in high-demand as approved by the TENCO WDB.
- b. The document showing the expectations of employment should be uploaded.

4. Is the training reasonably available?

Identify if the training is accessible to the customer within the local commuting area. Is the training on the Eligible Training Provider List (ETPL).

- a. Commute area is defined as 50 miles from the customer's residence.
- b. Upload a map showing the mileage between the customer's residence to the training institution that reflects the training is within 50 miles.
- c. If the customer is attending training outside of the commute area and/or out-of-state training, the Career Counselor should discuss additional resources with the customer. The Career Counselor must justify in case notes why the customer has selected to go outside of the commute area and/or to an out-of-state training provider. Examples of justification may be due to shorter training length, acceptance into the program, only available training in the area, etc.
- d. If training is outside of the commute area and/or out-of-state, the Career Counselor will utilize and upload the School Comparison Log to review three schools. The review should include the distance from the customer's residence, the cost, the start date of the next available training, and the length of training.

- e. All occupational programs must be an Occupation in Demand as defined by the TENCO WDB and providers and programs must be on the ETPL for tuition, fees, and/or books to be paid through WIOA funds. Upload the ETPL document that reflects the provider and program is eligible for training funds. www.etpl.ky.gov

NOTE: If funding is used for support services only, the program must be an Occupation in Demand as defined by the TENCO WDB but does not have to be included on the ETPL.

5. Is training available at a reasonable cost?

- a. Reasonable cost is defined as Morehead State University's cost of attendance per fiscal year. This can be found at www.moreheadstate.edu/admissions/cost-of-attendance. The case notes and Training Assessment Criteria should reflect MSU's current cost of attendance and the cost of attendance for the training institution the participant is attending. The cost of attendance for the participant's training institution should be uploaded to documents.
- b. If the customer is attending training at an institution that is higher than MSU's cost of attendance, the Career Counselor should discuss additional financial resources with the customer. The Career Counselor must justify in case notes why the customer has chosen to attend training outside of the reasonable cost definition and how they will pay for the remaining portion of the training. Examples of justification may be due to shorter training length, acceptance into the program, only available training in the area, etc.

6. Is the customer qualified to undertake and complete the training? This includes financial, physical, and mental considerations. The Career Counselor should also determine the customer's interest matches the field of training.

- a. The customer must have an indicator of success as defined by *TENCO policy 20*. Regardless of the indicator utilized, documentation must be uploaded in KEE Suite/Documents. Ex: Past grades, GED, Letter admitted in Apprenticeship, ACT, TABE, etc.
- b. The customer will complete a personal budget sheet indicating they have the financial ability to attend training while maintaining their bills. The personal budget must be uploaded in documents.
- c. The Career Counselor will discuss any physical and/or personal restrictions that could affect the customer's training and/or employment in the field (example: lifting, vision, criminal background, etc.). Issues noted that will affect the customer's ability to successfully complete the training and/or locate employment should be identified in case notes.

- d. The customer will complete a career interest inventory, such as My Next Move or Career Edge, to indicate suitable training. The inventory results will be uploaded in documents.

NOTE: Career Counselors should be aware of and use the resources available through Vocational Rehabilitation when determining if a physical/mental condition might affect training and/or employment.

Based on evaluation and assessment, are skill-based training services needed as they will be unlikely to obtain/retain self-sufficient employment through career services alone?

- a. The Career Counselor must be able to answer “yes” to this question to provide funded training services.

Additional Information:

Individuals who are already enrolled in a training program when applying for WIOA assistance must still meet the need to train.

The TENCO Workforce Development Board **Policy #34** “Need to Train” includes additional local requirements. All Career Counselors should be familiar with **Policy # 34.**

References:

WIOA Regulations 680.200

Department of Workforce Development Policy “Need to Train” Effective 11/3/2015

TENCO Workforce Development Board Policy # 34 Need to Train

TENCO Workforce Development Board Policy # 28 Training Limitations