

<b>Policy Area:</b> State Workforce Development Board: State Governance 100-05	
<b>Title:</b> Training Services Requirement	<b>Number:</b> SWB-100-05-GN1
<b>Effective Date:</b> September 03, 2024	<b>Review by Date:</b> September 03, 2029
<b>Approved Date:</b> September 03, 2024 <b>Revision Date:</b>	<b>Approved by:</b> Scott A Adkins

**PURPOSE:**

This guidance notice provides detailed instructions and clarifications on the 40% minimum training expenditure requirement as outlined in state policy. It is intended to assist local workforce development boards (LWDBs) in understanding and applying the policy effectively.

**BACKGROUND:**

The state has implemented a policy requiring at least 40 percent of Adult and Dislocated Worker program funds to be allocated to training services. This initiative aims to ensure that a significant portion of resources is invested in programs that provide tangible benefits, lead to recognized credentials, and align with local workforce needs. By directing funds towards training that meets high-growth occupation demands, the policy supports effective workforce development and economic growth in the region.

To streamline compliance and reduce administrative burdens, the policy clarifies allowable expenditures, focusing on direct training-related costs and distinguishing them from general supportive services. It also simplifies case management and enhances data tracking, ensuring accurate reporting and efficient program management. This guidance notice provides LWDB(s) with clear instructions for implementing the policy effectively while addressing practical concerns and minimizing complexity.

**REFERENCES:**

- [State Board Policy 100-05](#)

**OVERVIEW OF TRAINING EXPENDITURE REQUIREMENTS:**

LWDB(s) must allocate at least 40 percent of WIOA Adult and Dislocated Worker funds—combining both Program Year (PY) and Fiscal Year (FY) portions of a given formula-funded grant—to training services. These services must:

- **Lead to Recognized Credentials:** Aim to achieve postsecondary education and workforce credentials.
- **Align with High-Growth Occupations:** Address local workforce needs and high-growth job sectors.

## **DIRECTLY TIED TO TRAINING VS GENERAL SUPPORTIVE SERVICES:**

- **Directly Tied to Training:**
  - Those services that are directly related to training, as opposed to secondary or more general support, include those that are essential for the participant to engage in and complete the training program itself. Examples include:
    - Tools and Equipment: Tools, equipment, or uniforms that are *required* for the specific training program.
    - Training Materials and Supplies: Books, manuals, and other materials or supplies that are necessary for participation in the training.
    - Testing and Certification Fees: Fees for exams, certifications, or licenses that are required to complete the training program or to qualify for a job upon completion.
    - Health and Medical Services Required for Training: Physicals, drug tests, or immunizations that are mandatory for enrollment or participation in the training program.
- **Not Directly Tied to Training**
  - General supportive services are not included in the 40% minimum training expenditure requirement. These services address barriers to training participation but are considered separately under general supportive services funding. Examples:
    - Housing Assistance: Support for temporary or emergency housing needs to ensure stability while participating in training programs.
    - Food Assistance: Provision of food vouchers or assistance programs to address nutritional needs during training.
    - Utility Assistance: Help with paying utility bills such as electricity, water, or heating costs to ensure participants can focus on their training.
    - Emergency Financial Assistance: Funds to cover unexpected expenses that may arise and hinder a participant's ability to attend training, such as car repairs or medical bills.
    - Health Services: Access to medical or mental health services that are not directly related to training but essential for maintaining overall well-being.
    - Legal Aid: Assistance with legal issues that could impact a participant's ability to engage in training, such as expungement services or legal consultations.
    - Childcare Assistance: Support for childcare needs that allow parents or guardians to attend training, although this is often considered general supportive service rather than training-specific.
    - Transportation Support: Assistance with costs related to commuting that are not directly tied to the training itself but help ensure participants can travel to and from training locations.
  - These services address various barriers that participants may face and are essential for facilitating participation in training programs, though they do not directly contribute to the training content or curriculum.

## **CASE MANAGEMENT:**

To simplify case management, the state has introduced a standardized time allocation approach:

- **Initial Enrollment:** Allocate 2 hours per participant for initial enrollment tasks, including:
  - *Example: Completing ITA applications or OJT contracts.*
- **Ongoing Training:** Allocate 30 minutes per participant per interaction for direct contact, including:
  - **Monitoring Progress:** Monitoring progress involves direct interaction with participants to discuss various aspects of their training, including attendance issues, assignment completion, understanding of the training material, and overall performance. It is important to note that simply collecting progress reports or related paperwork, without directly reviewing them with the participant, does not qualify for inclusion in the training expenditure rate. The primary goal of this interaction is to ensure that participants are on track to successfully complete their training.
  - **Reviewing the Training Plan:** Reviewing the training plan requires a detailed evaluation of the participant's training schedule, goals, and milestones. This process ensures that the training plan remains relevant and aligned with the participant's career goals, as well as the demands of high-growth occupations within the local workforce area
  - **Providing Supportive Services:** Providing supportive services includes offering assistance with various needs that directly enable participants to engage in and complete their training. This may involve facilitating access to essential tools, equipment, training materials, certification fees, and other resources necessary for the successful completion of the training program..
  - **Training Completion Activities:** As participants near the completion of their training, Career Planners should meet with them to review their training outcomes, discuss next steps, and provide guidance on entering the workforce. This concluding interview is critical to ensuring that participants are well-prepared to transition from training to employment.

#### **DATA CAPTURE AND REPORTING:**

Regions are required to track and report training expenditures with the following process:

- **Tracking Services:** Each month, record the total number of training-related services provided using either a tracking spreadsheet, as illustrated in this guidance notice below, or the Workbook provided by WFWV (linked below).
  - *Note: The tracking sheet **must** be submitted with the monthly MACC reports and the obligation sheet to [wfwvmonthlyreports@wv.gov](mailto:wfwvmonthlyreports@wv.gov). Without the tracking sheet, WFWV cannot verify the reported amounts, which may result in those amounts being excluded and not counted.*
  - *Note: Activities should only be recorded once fully completed. For example, the initial OJT setup, which may take several days, should not be recorded until all components are complete and the participant is ready to begin training.*
- **Time Allotment and Cost Calculation:**
  - Calculate the Total Cost: Multiply the number of services by the predetermined time allotment, then by staff wages and benefits.

- *Example: If 50 services are provided, and each requires 2 hours at a \$25 hourly rate with \$5 benefits per hour, calculate the total cost as: 50 services × 2 hours × (\$25 hourly rate + \$5 benefits) = \$3,000.*

- **Reporting:**

- **Monthly Reports:** Include the total dollar amount in the additional line item section of the MACC reports, each month.
- **Supporting Documentation:** Provide a list of MACC ID(s) and ensure that detailed MACC notes are recorded in the MACC system to justify the expenditure.
- *Note: If MACC notes do not adequately reflect allowable activities, the state will notify the Region and adjust the reported amount accordingly.*

**ANNUAL REPORT TO THE SWDB:**

The annual report to the State Workforce Development Board will summarize the current year’s grant *closeout* expenditures, reflecting the actual amounts. This report will include:

- **Actual Training Expenditures:** Final figures for training expenditures for the year.
- **Wages and Benefits:** Detailed breakdown of wages and benefits costs related to training activities.

**IMPLEMENTATION AND CONTACT:**

This guidance notice is effective immediately. Please review the Training Services Policy [HERE](#). For any questions or further clarification, contact Michael Crown at [michael.d.crown@wv.gov](mailto:michael.d.crown@wv.gov) or Jonathon Compton at [jonathan.d.compton@wv.gov](mailto:jonathan.d.compton@wv.gov).

**EXAMPLE TRACKER:**

Below is an example of a suitable tracking sheet. Required elements:

- MACC ID #, Name, Activity, Date of Service, Service type provided, time allotted and wages (including benefits).

WorkForce West Virginia has also created an Excel workbook for tracking purposes (SWD-100-05-GN1\_Tracker Workbook), to access the workbook, please click [SWB-100-05-GN1-here](#), [Training Service Tracker](#).

MACC ID #	Participant Name	Activity	Date of Service	Services Provided	Time Allotted	Wages and Benefits total
EX. 111369	Jordan, Michael	Initial	08/27/2024	Setup	2	\$50.00
EX 111367	Pippen, Scottie	Ongoing	08/27/2024	Monitoring	.5	\$12.5
				Total	2.5	\$62.50

**WIB Fiscal Reporting  
Adult Report - PY2024**

**MACC Reporting Example**

Grant Number: PY24-R-Test  
 Grant Title: WIOA Adult  
 Grantee Name and Address: Test  
 Test  
 Grant Period: 07/01/2024 To 06/30/2026  
 Report Period: 07/01/2024 To 07/31/2024  
 Monthly / Final Report:  Monthly  Final

**Total Federal Funds Available** \$ 0.00  
**Total Cash Received** \$ 0.00  
**Total Cash Disbursements** \$ 0.00  
**Total Cash On Hand** \$ 0.00  
**Total Federal Accrued Expenditures** \$ 0.00

**Federal Admin Accrued Expenditures**

	Admin Budgeted Expenditures	Admin Accrued Expenditures	Admin Budget vs. Actual Variance
1 Personnel	\$ 0.00	\$ 0.00	\$ 0.00
2 Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00
3 Travel	\$ 0.00	\$ 0.00	\$ 0.00
4 Equipment	\$ 0.00	\$ 0.00	\$ 0.00
5 Supplies	\$ 0.00	\$ 0.00	\$ 0.00
6 Contractual	\$ 0.00	\$ 0.00	\$ 0.00
7 Other	\$ 0.00	\$ 0.00	\$ 0.00
8 Training Costs	\$ 0.00	\$ 0.00	\$ 0.00
9 Supportive Services	\$ 0.00	\$ 0.00	\$ 0.00
10 Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00
		\$ 0.00	

Wages will be reported here as normal.

Case Management wages related to training will NOT be included here.

**Federal Program Accrued Expenditures**

	Program Budgeted Expenditures	Program Accrued Expenditures	Program Budget vs. Actual Variance
1 Personnel	\$ 0.00	\$ 0.00	\$ 0.00
2 Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00
3 Travel	\$ 0.00	\$ 0.00	\$ 0.00
4 Equipment	\$ 0.00	\$ 0.00	\$ 0.00
5 Supplies	\$ 0.00	\$ 0.00	\$ 0.00
6 Contractual	\$ 0.00	\$ 0.00	\$ 0.00
7 Other	\$ 0.00	\$ 0.00	\$ 0.00
8 Training Costs	\$ 0.00	\$ 0.00	\$ 0.00
9 Supportive Services	\$ 0.00	\$ 0.00	\$ 0.00
10 Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00
		\$ 0.00	

Wages will be reported here as normal.

Case Management wages related to training will NOT be included here.

**Total Federal Unliquidated Obligations** \$ 0.00  
**Total Federal Obligations** \$ 0.00  
**Program Income Earned** \$ 0.00  
**Program Income Expended** \$ 0.00  
**Total Non-Federal Funds Expended For WIOA** \$ 0.00

**Additional Expenditure Data**

Total Other Federal Funds Expended \$ 0.00  
 Expenditure of Adult Funds Transferred To DW Program \$ 0.00  
**\*\* Note:** Expenditures resulting from the transfer of Adult funds to the Dislocated Worker program. (This represents Adult funds expended on the Dislocated Worker Program)\*\*.

Training Expenditures \$ 0.00 ✓ Case Management wages related to training will be included here.  
 Transitional Job Expenditures \$ 0.00  
 Incumbent Worker Training Expenditures \$ 0.00 ✗ Case Management wages related to training will NOT be included here.  
 Pay-For-Performance Contract Expenditures \$ 0.00