



COUNTY OF LOS ANGELES WIOA ADULT, DISLOCATED WORKER AND YOUTH PROGRAMS DIRECTIVE



DATE: June 1, 2017

NUMBER: WIOA D16-08

WIOA TRAINING LEVERAGE EXPENDITURE REPORTING REQUIREMENTS

EXECUTIVE SUMMARY

This directive provides guidance to County of Los Angeles America's Job Centers of California (AJCCs) administering Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker and Youth programs on the County's policy, along with procedural information concerning the reporting of training leverage expenditures.

This Directive supersedes Directive LACOD 12-6

REFERENCES

- California AB 1270 (Chapter 94)
- California SB 734 (Chapter 498, Statutes of 2011)
- Employment Development Department (EDD) Workforce Services Directive WSD14-01, WIA Training Expenditure Requirements

BACKGROUND

AB 1270 (Chapter 94), was set forth to update statutory references to the Workforce Investment Act of 1998 to instead refer to the Workforce Innovation and Opportunity Act of 2014 and make related conforming changes, adopted in whole the provisions of SB 734 (Chapter 498, Statutes of 2011) that added Section 14211 to the California Unemployment Insurance Code (CUIC). This section of the CUIC requires Local Boards to spend a certain percentage of available federal funds for Adults and Dislocated Workers on workforce training programs in a manner consistent with federal law and would allow the boards to leverage specified funds to meet the imposed funding requirements.

Local boards must spend at least 30 percent of the combined total of their adult and dislocated worker formula fund allocations on training services. *The minimum training expenditure requirement does not apply to the youth formula fund allocation.* In addition,

Local boards may apply designated leveraged resources used for training (up to 10 percent of the combined total of the Adult and Dislocated Worker formula fund allocation) toward meeting the minimum training expenditure requirement.

POLICY AND PROCEDURES

To meet the aforementioned requirements, LA County is requiring that all WIOA Service Providers regularly report training leveraged resources. Note Youth formula funds are not statutorily subject to the minimum training expenditure requirement, however Workforce Development, Aging and Community Services (WDACS) provides training funds for the WIOA Youth program, and as such is requiring that training leverage applicable to Youth formula funds be reported in order to ensure a full accounting of resources used for training in WIOA formula programs are appropriately tracked.

Acceptable Leveraged Resources are as follows:

1. Federal Pell Grants established under Title IV of the Higher Education Act of 1965
2. Public programs authorized by the Workforce Innovation and Opportunity Act (e.g., Job Corps, Migrant Seasonal Farm Worker, Rapid Response, WIOA Title II Adult Education and Literacy, national and state WIOA discretionary grants, WIOA youth program, etc.). This category of leveraged resources does not include WIOA Adult and Dislocated Worker formula funds. Note: it is permitted to apply Youth formula funds expended on training for individuals ages 18-21 as a leveraged resource if: (1) the individuals are co-enrolled in either the WIOA Adult or Dislocated Worker program, and (2) the training meets all requirements set forth in EDD Directive WSD14-1.
3. Trade Adjustment Assistance
4. Department of Labor National Emergency Grants
5. Match funds from employers, industry, and industry associations including the employer paid portion of customized training, the wages of an apprentice during the apprenticeship period, and the employer paid portion of on-the-job training (OJT). Note: match funds from the employer paid portion of OJT may only include the employer's cost attributed to the participant's training.
6. Match funds from joint labor-management trusts
7. Employment training panel grants

These leveraged resources must be attached to expenditures that result from providing the following qualifying training services:

- Occupational skills training, including training for nontraditional employment;
- On-the-job training;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training;
- Incumbent Worker training in accordance with Section 3174(d)(4) of Title 29 of the United States Code;
- Transitional Jobs in accordance with Section 3174(d)(5) of Title 29 of the United States Code
- Job readiness training provided in combination with any of the training services described above;
- Adult education and literacy activities provided in combination with any of the training services described above (*with the exception of Transitional Jobs and Job Readiness Training*); and
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Furthermore, all of the training services must be provided as part of a program of training services that meets the definition as provided in Title 20 CFR Section 680.420.

In addition, funds expended on Supportive Services cannot be counted towards meeting the minimum training expenditure requirement. Adherence to this provision will be reviewed during technical assistance visits and formal monitoring.

Once all of the above conditions are met, Service Providers operating WIOA Adult, Dislocated Worker, and Youth programs shall report training leveraged resources as follows:

1. Ensure leverage is reported at the point of the training when full tuition is earned. If full tuition is earned when 50% of training is completed, then report leverage at that time. Leverage must still be reported in cases where, and at the point of when, the student dropped the training course, but full or partial payment is still owed or any tuition reimbursement would not be applicable.
2. Record leveraged resources in CalJOBS within the Activity Enrollment Cost Tab, updating in real time, as appropriate.
3. Track all leveraged resources on a monthly basis, separately by WIOA program, utilizing Attachment I, *Training Expenditure Leveraged Resources Tracking Workbook* by inputting the following:
 - a. Participant Last Name
 - b. Participant First Name
 - c. WIOA Application Number
 - d. Training Activity
 - e. Training Activity CalJOBS Code

- f. Training Cost
- g. Resource Leveraged
- h. Leverage Amount
- i. Total WIOA Funded Training Cost

Report this monthly amount on the appropriate Detailed Expenditure Report (DER) that is submitted with your monthly invoice to WDACS Financial Management Division on the 10th calendar day of the month, following the month covered in the invoice.

4. Report a completed *Quarterly Training Expenditure Leveraged Resources Form* (provided within Attachment I) to WDACS on a quarterly basis by submitting on the 15th of the month following the reporting quarter in conjunction with the *Training Expenditure Leveraged Resources Tracking Workbook* that has been completed for all months within the reporting quarter, separately for each applicable WIOA program.
 - a. The *Training Expenditure Leveraged Resources Form* must be signed by both the staff completing the *Training Expenditure Leveraged Resources Tracking Workbook* and the Executive Director, or designee.
 - b. Both the *Training Expenditure Leveraged Resources Form* and the *Training Expenditure Leveraged Resources Tracking Workbook* individual worksheets as applicable, must be submitted to WDACS in PDF format.

ACTION

1. Utilize the attached *Training Expenditure Leveraged Resources Tracking Workbook* to track detailed training expenditure leveraged resources on a monthly basis, separately for each applicable WIOA program.
2. Report this monthly amount on the appropriate Detailed Expenditure Report (DER) that is submitted with your monthly invoice to WDACS Financial Management Division, on the 10th calendar day of the month, following the month covered in the invoice.
3. Submit the *Quarterly Training Expenditure Leveraged Resources Form* to WDACS signed and in PDF format, along with the *Training Expenditure Leveraged Resources Tracking Workbook* individual worksheets as applicable, separately for each applicable WIOA program, via email to wioaops@wdacs.lacounty.gov.

Service Providers operating WIOA Adult, Dislocated Worker and Youth programs should ensure that the requirements described herein are communicated throughout the fiscal, operations, management and partnership governance structure of the contractor's organization and that this Directive is adhered to until further notice.

INQUIRIES

Inquiries regarding this directive and the policies and procedures described herein should be directed to wioaops@wdacs.lacounty.gov.



**Josie Marquez, Assistant Director
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Attachments:

1. Expenditure Leveraged Resources Tracking Workbook (includes Training Expenditure Leveraged Resources Form)