



## **WIOA COMMITTEE**

GoToMeeting® 2:00 – 5:00 PM  
Tuesday, July 10, 2018  
Walt Sullivan Building, Helena, MT

**MEMBERS PRESENT:** Commissioner Jane Weber (Chair); Casey Blumenthal; and Katie Madsen

**MEMBERS EXCUSED:** Paul Hopfauf and Commissioner Mike McGinley

**STAFF:** Shannon Lewis, Erin Weisgerber, and Jane Demaray

**CALL TO ORDER/ROLL CALL:** Chair Weber called the meeting to order at 2:00.

**ROLL CALL:** Shannon Lewis conducted roll call and established a quorum.

**AGENDA:** Chair Weber asked for a motion to approve the agenda.

***Ms. Blumenthal moved, and Ms. Madsen seconded a motion to approve the agenda.***

***The motion carried.***

**AGENDA:** Chair Weber asked for a motion to approve the March 13, 2018 meeting minutes.

***Ms. Madsen moved, and Ms. Blumenthal seconded a motion to approve the March 13, 2018 meeting minutes.***

***The motion carried.***

### **NEW BUSINESS:**

**SERVICE PROVIDER REPORTING & AUDIT REQUIREMENTS POLICY:** Ms. Lewis discussed the Service Provider Reporting & Audit Requirements Policy, which applies to all service providers operating WIOA programs. The policy would require service providers to submit quarterly program and financial reports for the adult, youth, dislocated worker, state displace homemaker, rapid response, and national dislocated workers grants. In addition, the policy requires that all service providers are responsible for their own annual independent program audits per the Uniform Guidance.

Chair Weber asked for a motion to approve the Service Provider Reporting & Audit Requirements Policy.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to approve the Service Provider Reporting & Audit Requirements Policy.***

***The motion carried.***

**PERFORMANCE MEASURES POLICY:**

Ms. Lewis reviewed the Performance Measures Policy which applies to all service providers operating WIOA Title I, TAA or NDWG and the program managers, fiscal officers, and the team of people who monitor these programs. The policy outlines the 2<sup>nd</sup> quarter performance measure reporting required for all participants exiting these programs. The table within the policy will reflect the current negotiated performance metrics.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to approve the Performance Measures Policy.***

***The motion carried.***

**CREDENTIALS POLICY:**

Ms. Lewis walked the committee through the Credentials Policy, which applies to all service providers operating WIIA Title I Adult, Dislocated Worker or Youth programs. The policy outlines the expectations of credentialing and the expectations to include the credential in the client's service strategy and reinstates the understanding that clients are expected to complete program requirements and complete the programs.

***Ms. Madsen moved and Ms. Blumenthal seconded a motion to approve the Credentials Policy.***

***The motion carried.***

**RAPID RESPONSE POLICY:**

Ms. Lewis discussed the Rapid Response Policy, which applies to all service providers operating rapid response programs. The policy outlines all activities that must take place for each rapid response, regardless of the size or impact.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to approve the Rapid Response Policy.***

***The motion carried.***

**CASH MANAGEMENT POLICY:**

Ms. Weisgerber discussed the Cash Management Policy, which applies to all service providers operating WIOA Title I programs. The policy outlined the process and documentation that providers must do when handling cash for these programs.

***Ms. Madsen moved and Ms. Blumenthal seconded a motion to approve the Cash Management Policy.***

***The motion carried.***

**COST PRINCIPLES, ALLOWABLE COSTS AND UNALLOWABLE COSTS POLICY:**

Ms. Weisgerber discussed the Cost Principles, Allowable Costs, and Unallowable Costs Policy, which applies to all service providers operating WIOA Title I programs. The policy provides the financial and administrative requirements applicable to federally funded programs in the one-stop system. The policy aligns with OMB Uniform Guidance 2 CFR Part 200 Subpart E, which contains the federal cost principles that define when and how costs can be charged to grants.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to approve the Cost Principles, Allowable Costs and Unallowable Costs Policy.***

***The motion carried.***

### **ON-THE-JOB TRAINING POLICY:**

Ms. Lewis discussed the On-the-Job Training (OJT) Policy, which applies to all service providers operating WIOA Title I Adult, Dislocated Worker, and Youth programs. OJT is training by a business that is provided to a paid client engaged in work in a job that provides skills designed to perform the job. This policy contained three options for the committee's consideration.

The first option Ms. Lewis discussed with the committee was the reimbursement requirements option related to the characteristics of the client, and the type of training that is reimbursable under the OJT policy. The committee agreed that the policy should include language that allowed for reimbursement under OJT contracts if the training is an apprenticeable occupation and the business has agreed to sponsor a registered apprenticeship.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to allow OJT reimbursement for training if the training is an apprenticeable occupation and the business has agreed to sponsor a registered apprenticeship.***

***The motion carried.***

### **FINAL POLICY LANGUAGE:**

Reimbursement requirements:

- Reimbursement under OJT contracts are deemed to be compensation for the extraordinary costs associated with training clients and the costs associated with the lower productivity of the clients. The standard reimbursement rate for OJT contracts is up to 50%. An OJT contract reimbursement rate may be up to 75% if a higher rate is justified based on one or more of the following factors:
  - Migrant or Seasonal Farmworkers;
  - Youth aged out of foster homes;
  - English language learners;
  - Displaced homemakers;
  - Low-income individuals;
  - Indians, Alaskan Natives, and Native Hawaiians;
  - Individuals with disabilities, including individuals who are in receipt of Social Security Disability Insurance;
  - Older individuals;
  - Individuals within two years of exhausting lifetime TANF eligibility;
  - Single parents (including single pregnant women; and
  - Long-term unemployed individuals (unemployed for 27 or more consecutive weeks).
  - The size of the business (50 or fewer employees);
  - The quality of business-provided training and advancement opportunities;
  - The training is in an apprenticeable occupation and the business has agreed to sponsor a registered apprenticeship.

The second option Ms. Lewis discussed with the committee was the contract period for training time. The current policy only allows for 1040 hours of training as a maximum number of hours allowable for training. The new proposed option would allow

flexibility in the number of hours allowed for training using the O-Net code, which could reduce hour maximums in some cases and increase maximums in others.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to continue using 1040 hours as the maximum number of hours allowable under the OJT Policy.***

***The motion failed.***

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to use O-Net data to determine the training hours allowable under the OJT Policy***

***The motion passed.***

The third option Ms. Lewis discussed with the committee was the trainee entrance schedule, which currently allows for the participant to enter training within a one month period of the funding date on the contract. The option provided to the committee would allow the participant to enter training within 15 days of the funding date on the contract, reducing the number of days from establishing the contract to getting the client working, which is a benefit to the client.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to require that all OJT employees to enter training within 15 days of the funding date on the contract.***

***The motion carried.***

#### **FINAL POLICY LANGUAGE:**

##### **Trainee Entrance Schedule:**

- All employees shall enter training within 15 days of the funding date on the contract.

#### **PROGRAM PARTICIPATION AND EXIT POLICY:**

Ms. Lewis discussed the Program Participation and Exit Policy, which applies to all service providers operating WIOA Title I or Title III programs. The policy updates the definition of a client as someone who will affect performance outcomes. Under WIA, anyone who used the workforce system was considered a client and providers were responsible for performance outcomes, regardless of the services received. The new policy outlines who a client is and who a reportable individual is and differentiates between the categories.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to approve the Program Participation and Exit Policy.***

***The motion carried.***

#### **QUALITY CONTROL POLICY:**

Ms. Lewis discussed the Quality Control Policy, which applies to all service providers operating WIOA programs. As the state of Montana is required to comply with a number of required reports, this policy outlines the responsibilities of the providers to ensure data is accurate and reported in a timely manner. In addition, this policy outlines the corrective actions that could happen should a provider not report data that is consistent with the negotiated performance standards.

***Ms. Madsen moved and Ms. Blumenthal seconded a motion to approve the Quality Control Policy.***

***The motion carried.***

**STOLEN OR FORGED CHECK POLICY:**

Ms. Lewis discussed the Stolen or Forged Check Policy which applies to all service providers operating WIOA Title I programs. The policy outlines what a provider should do should a payee lose a check. In addition, the policy outlines what a payee must do if the check is forged and redeemed.

***Ms. Madsen moved and Ms. Blumenthal seconded a motion to approve the Stolen or Forged Check Policy.***

***The motion carried.***

**WIOA WAGE AND SUPPLEMENTAL DATA SOURCES POLICY:**

Ms. Lewis discussed the Wage and Supplemental Data Sources Policy which applies to all service providers operating WIOA Title I programs. The policy describes the wage sources, supplemental data sources and the methods used to collect data for performance.

***Ms. Blumenthal moved and Ms. Madsen seconded a motion to approve the WIOA Wage and Supplemental Data Sources Policy.***

***The motion carried.***

**WIOA REPORTING REQUIREMENTS POLICY:**

Ms. Lewis discussed the WIOA Performance Reporting Requirements Policy. This policy applies to staff responsible for WIOA performance reporting. This policy describes the requirements and methodology for WIOA program performance reporting. The Division Management Services Bureau will report the information quarterly and annually. The reporting is negotiated annually with the U.S. Department of Labor, and the Division Management Services Bureau reports any changes to all those responsible for reporting.

***Ms. Madsen moved and Ms. Blumenthal seconded a motion to approve the WIOA Reporting Requirements Policy.***

***The motion carried.***

**ADJOURNMENT:**

Chair Weber adjourned the meeting at 3:30 PM.