

ACTION BULLETIN

TO: All Workforce Innovation and Opportunity Act (WIOA) Funded Alameda County Workforce Development Board (ACWDB) Service Providers

DATE: December 2, 2025

SUBJ: ACWDB's WIOA Training Policies

PURPOSE OF BULLETIN:

This bulletin provides **an update to ACWDB** WIOA training guidance and establishes policies regarding WIOA-funded training opportunities for eligible WIOA Adult and Dislocated Worker participants. **Updates to the original policy will be presented in bold text. Policies as established through this revision may be applied to discretionary grant programs if those grant funds do not contain specific conditions regarding training opportunities for participants.**

CITATIONS:

- WIOA Sections 3, and 134
- Title 20 Code of Federal Regulations (CFR) Sections 680.200 and 680.900-680.970
- **US Department of Labor (DOL), Employment and Training Administration (ETA) Training and Employment Guidance Letter (TEGL) 10-16, Change 3**
- California's Employment Development Department (EDD) Workforce Services Directive (WSD) 18-10 – WIOA Training Expenditure Requirement; issued January 31, 2019.
- EDD's Workforce Services Information Notice (WSIN) 17-09 – CalJOBSSM Activity Codes; issued October 29, 2019.

BACKGROUND:

The State of California enforces a mandate upon all WIOA Local Workforce Development Areas (LWDA) across the state – that an amount equal to 30% of the WIOA Adult and Dislocated Worker funding allocations be spent on occupational skills training for WIOA eligible participants each program year. This mandate allows 10% (1/3 of the 30% training mandate) to be accounted for through leveraged sources other than WIOA **formula** training dollars.

A Local Area's failure to meet this WIOA Training Expenditure requirement may result in state-mandated development of corrective action plans and ultimately may cause the local area to be determined ineligible for special projects, discretionary grant funding, **or High-Performing Board status.**

ACWDB WIOA Training Policies:

The following policies represent federal requirements mandated through the WIOA legislation, state requirements based on EDD guidance, and local policies.

1. Funding of Last Resort:

WIOA mandates that WIOA training allocations must be the funding of last resort for training and training-related expenses for WIOA-eligible participants.

In order to ensure that individual participants are not eligible for other sources of training funds, Career Coaches **must** guide participants through a comprehensive process to explore alternative sources of training funds (i.e., Pell Grants, Job Corps, Trade Adjustment Assistance (TAA), National Emergency or National Dislocated Worker Grants, Employment Training Panel (ETP) Grants, Temporary Aid for Needy Families (TANF) programs, CalGrants, and other grants available under the Free Application for Federal Student Aid (FAFSA), etc.) – and confirm, through a “training suitability” process that the individual participant is not eligible for other training resources.

2. Timeliness of Training Request Submittals:

Individual Training Account (ITA) and On-the-Job Training (OJT) paperwork and/or requests for Local Board Determination (LBD) Training (defined below), must be submitted to the attention of Workforce Development Board staff at least ten (10) working days prior to the projected begin date of the training program.

In rare instances, it may be possible to fast-track the paperwork for training, but in many instances, paperwork is not completed correctly and must be resubmitted with corrections prior to receiving approval from ACWDB staff. This is the primary reason that ACWDB has established a requirement for **a ten (10) working day** advanced notice for the processing of all training requests.

Failure to comply with the requirement to submit paperwork at least ten (10) working days in advance of the anticipated training begin date may result in Career Service Provider (CSP) organizations being responsible to cover training costs through sources other than WIOA – especially in circumstances where there is no other remedy.

3. Training Suitability:

Career Coaches must make a determination of suitability for WIOA-funded training before referring an eligible participant to WIOA-funded training services.

Training suitability may be determined based on a number of factors. Some examples of items to consider for training suitability include whether the participant:

- A. May be eligible for training funds through alternate **funding** sources
- B. Meets any prerequisite criteria established by the training provider

- C. Is financially stable to ensure full engagement in and successful completion of the training program
- D. Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency without training
- E. Has selected a training program that is directly linked to employment opportunities within the local area or planning region – or in another area where the individual participant is willing to commute or relocate for work
- F. Has researched the daily responsibilities of an individual employed in their field of interest
- G. Is able to fully engage in and successfully complete the program despite the existence of barriers (i.e., transportation, childcare needs, financial needs, scheduling conflicts, etc.) which should be determined during the training suitability assessment.**

Determination of these factors may be made through an assessment of suitability for training. This assessment may be completed on a form template provided by ACWDB, or from within the CalJOBS system, or through tools created by ACWDB's contracted service providers – as long as items A-G above are included as part of that assessment.

4. WIOA Training Cost Cap per Participant:

The cost caps for training funds spent on an individual participant are:

- A. Up to **\$7,500** for a single occupational skills training program, leading to an industry recognized credential; or
- B. Up to **\$10,000** when a single occupational skills training program is bundled with an On-the-Job Training (OJT) opportunity

Individual participants may NOT engage in bundling of training programs in an attempt to fully expend the **\$7,500**. The **\$7,500** cap is to be applied to a single training program that leads to an industry-recognized credential. There is no remaining balance if a training program does not require full use of the **\$7,500**.

- C. Career Coaches may apply for a waiver of this **cost** cap in the event of extenuating circumstances that exist for a specific participant.

COST CAP WAIVER REQUIREMENTS

A cost cap waiver may be requested in the event that the following circumstances are present:

- i. The participant is seeking training that will lead to an industry-recognized certificate or credential in an industry sector that falls within ACWDB's Industry Sector and Occupational Framework (ISOF); and
- ii. There are funds available within the appropriate Grants Checkbook to cover the full cost of the training; and

- iii. There are no other training courses that offer a comparable certification for less than the requested cost – or the only other available course is being held in-person and outside the general area of the participant’s residence; and
- iv. Both the Career Coach and the site manager agree that the individual participant’s circumstances justify the waiver request; and
- v. The total amount **being requested** does not exceed the \$10,000 cap as referenced in item 4.B., above.

Waiver requests should be submitted in writing to the attention of the assigned Workforce Technician and to the ACWDB Career Center Coordinator. **The Waiver request MUST include justification for the request that references each of the cost cap waiver requirements as listed in Section 4.C. items i. through v., above.** ACWDB anticipates a **five (5) working day** turn-around on approvals or denials of these waiver requests – measured from the date that correct and complete paperwork has been submitted. Once the waiver request has been approved by ACWDB staff, then the standard training paperwork may be drafted and submitted for official approval.

5. Regular, Ongoing Progress Reports and Status Check Ins:

There is an inherent expectation that Career Coaches maintain regular, ongoing contact with their participants throughout the duration of the occupational skills training program.

Progress reports should be collected from the training provider and maintained within the participant’s case file.

Evaluation of training progress should be performed periodically during the entire period that the participant is engaged in occupational skills training. This evaluation should be performed through outreach to the participant AND the training provider.

When a training provider’s refund policy contains reference to a specific period of time (grace period) after which there is no opportunity for refund; then the evaluation of training progress should be made before that time period expires.

It is strongly recommended that the Career Coach establish a schedule to ensure that progress reports and/or training progress evaluations occur at least twice within the training period; once at the beginning of training to ensure the participant has started training and plans to complete – and at the mid-point of training to ensure that progress is being made and that the program is a good match for the participant. When training is longer than one month, it is reasonable to schedule at least one “check-in” per month. All progress reports and progress evaluations should be recorded using case notes and progress report forms that may be generated by the training provider. When progress is being made those accomplishments must be tracked through Measurable Skill Gains (MSG). Assigned Workforce Technicians can assist with ensuring that tracking is recorded correctly within the CalJOBS system.

6. Multiple Training Opportunities for WIOA Participants:

In most cases, individual participants are eligible for a single training opportunity during a participation cycle. A participation cycle begins on the date of the WIOA application or the date of participation (these two dates usually match) – and ends on the date of case closure in the CalJOBS system.

If an individual requests a secondary training **course or program** (whether it be during the same or a subsequent participation cycle), there must be justification provided to ACWDB staff regarding why the individual was unable to obtain or retain employment using skills that were acquired through the original training program – **or that the secondary training program would increase the participant's chances of employment based on the attainment of additional occupational skills – which should be verified through presentation of job postings listing the additional skills as required knowledge for the job.** This evaluation must be carried out regardless of the amount of time that has lapsed between the initial training activity and the current request for secondary training. **Career Coaches must verify through review of the participant's CalJOBS records whether they have been provided WIOA-funded training in the past.**

If the secondary training is during the same participation cycle, then the total cost of the two training programs must NOT exceed the **\$10,000 cap as referenced in Section 4. above.**

If the secondary training program has been adequately justified **through verification that the individual successfully completed their first occupational skills training program** and remained unable to obtain/retain employment; and the secondary training is being offered through a subsequent participation cycle, then the participant would be eligible for **\$5,000 toward the secondary occupational skills training program in addition to any balance that went unspent from the first training program.** **Verifications required for the participant to have a second opportunity at training will require a Career Coach to research the participant's history with WIOA participation and training and conclude that a second opportunity for training is justified.**

ACWDB will consider the justification regarding why a participant was unable to obtain or retain employment with the skills and certifications that were achieved through the first training opportunity. Individual participants who fail to attend interviews or decline offers of employment will NOT be considered for secondary training opportunities. The failure to obtain or retain employment must be related to the level of skill or certification that was awarded upon successful completion of the first training opportunity.

Requests for secondary training programs for a single participant should be approved by the CSP site manager, submitted through a request to your assigned Workforce Technician and to ACWDB's Career Center Coordinator, and include any relevant documentation. Approval of the request must be received, in writing, from ACWDB staff before **allowing the participant to begin training.** ACWDB anticipates a **five (5) working** day turn-around on approvals or denials of these requests, measured from the

date that full, self-explanatory request was submitted. Upon approval from ACWDB staff, Career Coaches should draft and submit the training paperwork – which would then be subject to the ten (10) working day requirement in that the training must not be scheduled to start before the tenth working day after the paperwork has been submitted.

Bundling of prerequisite or supplemental training programs with standard occupational skills training programs will be considered for WIOA funding if the following conditions exist:

- A. Successful completion of the prerequisite or supplemental program will increase the participant's employability beyond that of the occupational skills training program alone.**
- B. The total cost of the bundled training programs does not exceed the cost cap amount of \$10,000 as referenced in Section 4. above.**
- C. Evidence is submitted justifying the need for the prerequisite or supplemental program in addition to the standard occupational skills training. The evidence may include job postings referencing the requirement for the additional occupational skills.**
- D. The request for bundled programs is submitted to ACWDB staff (as referenced above) at least ten (10) working days in advance of the projected begin date for the earliest of the bundled programs.**
- E. Bundling of prerequisite or supplemental programs with standard occupational skills training programs will be limited to two total programs:**
 - a. One standard occupational skills training; and**
 - b. One prerequisite or supplemental program.**

7. Co-Enrollment for Training:

Co-enrollment for training may occur when an individual participant has an opportunity to enroll in a special project or other discretionary grant to fund their training. Participation in multiple grant programs is allowable under WIOA as long as there is no duplication of service between the two (**or more**) grants. If multiple Career Coaches are involved with the provision of services through these multiple grant programs, there should be coordination to ensure that services under one grant do not duplicate services that were provided under another grant.

8. Local Board Determination (LBD) Training:

The Alameda County Workforce Development Board took action at their May 18, 2018, meeting to allow eligible participants to receive WIOA funding for training programs that are not listed on California's Eligible Training Provider List (ETPL). Specific conditions must be present in order to request use of LBD training. Please reference ACWDB's Action Bulletin (AB) 18-04 Revision 5, for the most up-to-date guidance on use of the

LBD training option. AB 18-04 R5 is available through ACWDB website on [ACWDB's Program Policies Page](#).

9. Training Opportunities for Youth:

Occasionally, depending on the availability of WIOA Adult training funds, ACWDB will allow for the set-aside of WIOA Adult training funds for WIOA Youth participants who are **out-of-school**, at least 18 years of age, and who possess one or more barriers to employment that would identify them as WIOA Adult Priority Population participants. **Usually, this set-aside of WIOA Adult training funds will be made available to Youth Service Providers on a first-come, first served basis – unless there are other arrangements made to ensure that each Out-of-School Youth Service Provider has access to their own allocation of training funds.**

The Youth Program Specialist will provide notice to all Youth service providers when these training funds are made available. **Such an announcement will include the conditions under which the funds must be accessed and utilized.**

In most cases, the ITA paperwork will be handled internally by the Workforce Services Support Team (WSST) staff. Access to this opportunity requires that the youth participant be determined eligible as a WIOA Adult – and co-enrolled into the WIOA Adult program. This additional eligibility determination will be facilitated by WSST staff with the assistance of the referring Career Coach.

Once notified of the availability of WIOA Training funds for youth participants, Youth CSP should identify appropriate candidates from their pool of WIOA-enrolled youth participants – and assess the individual for WIOA training suitability using guidance as provided in item “3. Training Suitability”, above.

Additionally, the youth candidate must be assessed to determine whether they meet any of the WIOA Adult Priority Population criteria. This criteria may be found in ACWDB’s AB 17-08 R3 – WIOA Adult Priority of Service on [ACWDB's Program Policies Page](#).

Once a determination has been made regarding suitability and priority population status, Youth CSPs should send a request to ACWDB’s Youth Program Specialist and their assigned Workforce Technician.

ACWDB anticipates a **five (5) working day** turn-around on approvals or denials for these requests and would require, at a minimum, a **ten (10) working day** advance notice between the date of the request and the scheduled begin date of the training program.

10. Applicability of these policies to other grant funds that offer training

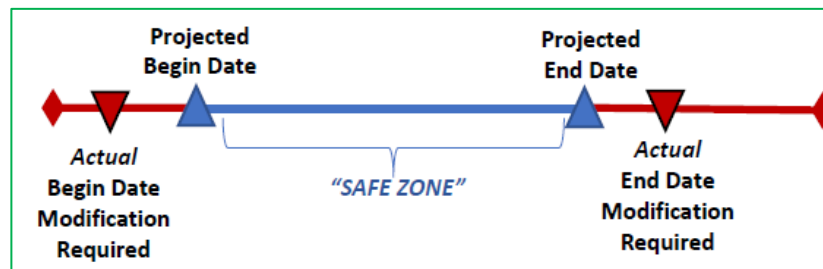
ACWDB may apply, at their discretion, different aspects of this policy to training that is offered through discretionary or other special project grants that do not have pre-established parameters regarding the use of training funds. Notification will be provided regarding which (if any) of these training policy requirements will be applied to any special or discretionary project grants.

11. Training Modifications and Cancellations:

Training modifications and cancellations must be submitted for ALL training programs when an approved/processed training opportunity is either cancelled or modified as follows:

- Change to the Projected Begin Date (if the Actual Begin Date will fall before the originally Projected Begin Date)
- Change to the Projected End Date if the Actual End Date is anticipated to fall after the Projected End Date
- Change to the training course or program the participant had been approved to attend (Cancellation only; not Modification)
- Change to the cost of training (training providers are not allowed to charge more than the cost listed on the Eligible Training Provider List (ETPL))
- Change of training provider/school (Cancellation only; not Modification)
- When the participant drops from the program or decides not to attend or complete the program, regardless of whether part or all of the training costs must still be covered by WIOA.

Below is a chart to use as a guide for determining when a modification must be submitted:



- If your Actual Begin and End dates fall within the “SAFE ZONE”, then there is no need to submit a modification
- If your Actual Begin or End date fall outside the “SAFE ZONE”, then a modification **MUST BE** submitted.

These modifications and cancellations must be submitted using the most current version of the Modification or Cancellation forms as available on [Google Share Drive / Training Forms](#) and must be submitted to the attention of the assigned Workforce Technician, the Account Clerk managing the Grants Checkbook, the Career Center Coordinator, and ACWDB’s Fiscal Manager. Additionally, modifications and cancellations must be submitted within a reasonable timeframe to ensure that invoices and payments are not made toward an incorrect balance due.

If a training program cancellation results in a change of the WIOA training dollar encumbrance amount, then CSP staff must submit the following documentation with the cancellation:

- a. The training provider’s written refund policy; and

- b. Written confirmation from the training provider regarding the amount that will be refunded to the attention of Oakland Private Industry Council (OPIC) (or ACWDB's current vendor pay agent) including a breakdown of the refund amount; and
- c. If there is no refund due to OPIC, a written breakdown of the new amount of WIOA training funds to be obligated within the Grants Checkbook will be required.

12. Prohibition from Modifying Training Details Without ACWDB Staff Support:

CSP staff are prohibited from modifying the details of any training program within the CalJOBS system or in the Grants Checkbook. ACWDB staff hold exclusive responsibility to review, approve, and complete data entry for all training modifications and cancellations. CSP staff do hold responsibility for entering the date of completion for any training program that was completed on or before the projected end date of the training program as represented within the CalJOBS system.

13. Communications Regarding Training:

CSP staff are strongly encouraged to communicate directly with ACWDB staff regarding any issues or challenges with the training process including aspects of billing, invoicing, and invoice payments. CSP staff should not inquire directly with the vendor pay agent regarding challenges with paperwork, invoices, or processes related to the training. Failure to communicate with appropriate ACWDB staff in a timely manner could result in delay in processing of items related to training.

Any communications relevant to the processing of training paperwork, including the financial elements must include the ACWDB Workforce Technician, the Youth Program Specialist or the Career Center Coordinator, the Account Clerk and the Fiscal Manager.

Communications with participants engaged in occupational skills training is required to ensure that training is progressing as planned. Continuing communications should be tracked by using CalJOBS case notes and when relevant, enrollment activities that reflect services provided while in training. Participants should be informed that if they do not communicate with their Career Coach during their time in training, that the training program may be cancelled – especially in situations where the Career Coach has been unable to confirm attendance.

When CSP Staff have not successfully confirmed training progress through contact with the participant, there is an obligation to reach out to the training provider to ensure the participant is engaged in training as planned. Failure to confirm the status of training with the participant or the training provider may result in the CSP being responsible for cost incurred as a result of cancelled training that was never reported.

14. Individual Training Accounts (ITA) and the Eligible Training Provider List (ETPL):

All training providers/schools listed on the ETPL must adhere to the approved and published costs for training. Discounts will be accommodated, but no training provider should attempt to charge a higher price than is listed on the ETPL.

ACWDB staff (assigned Workforce Technician, Career Center Coordinator, Account Clerk, and Fiscal Manager), must be notified when there are discrepancies between the amount listed on the ETPL and the cost that the training provider is requesting for the program. When these discrepancies exist, ACWDB staff will coordinate with the local ETPL Coordinator to help facilitate a resolution. Discrepancies in training costs may result in delays that exceed the ten-working day turn-around time – and further delay the Projected Begin Date of training. Therefore, these discrepancies should be reported to ACWDB prior to initiating training paperwork to ensure the participant understands that the discrepancy must be resolved prior to initiating training.

15. Credential Attainment for Non-WIOA Training

To justify the expenditure of WIOA funds to support occupational skills training and training-related expenses, there is an inherent expectation of an Industry-Recognized Credential Attainment upon completion of training.

Under current WIOA regulations, if a participant is engaged in occupational skills training that is NOT supported in full or in part by WIOA funds, then the CSP and the Local Area are NOT allowed to take credit for credential attainment.

“Support” for occupational skills training programs can include the use of WIOA funds to cover:

- The cost of the occupational skills training program
- The cost of tools, clothing or supplies required to engage in the occupational skills training program
- The cost of supportive services provided to the participant in support of their participation in the occupational skills training program
- The cost of stipends or need related payments associated with participation in occupational skills training programs
- The cost of state or national exams for credentialing/certification.

If a WIOA participant whose training was funded through a source other than WIOA was provided support (as defined above) funded through WIOA, then the CSP and the Local Area can take credit for the credential attainment outcomes resulting from the occupational skills training program.

In order to track the occupational skills training program and take credit for the resulting credential attainment, the CSP must initiate a Training Provider Request Form and submit that form to the assigned Workforce Technician who will hold responsibility for entering one of the following activity codes:

- **Adults and Dislocated Worker – Activity Code 328-Occupational Skills Training (Non-ETPL Provider); or**
- **Youth – Activity Code 421-Enrolled in Post-Secondary Education (for participants enrolled in community college programs; or**
- **Youth – Activity Code 438-Occupational Skills Training (Non-ETPL Provider) for participants enrolled in occupational skills programs not at a community college.**

Credential attainments may then be recorded in the CalJOBS system and linked to the appropriate training activity code as referenced above once the occupational skills training program has been successfully completed.

All credential attainments must be associated with an appropriate training activity code in the CalJOBS system in order to count toward the Credential Attainment measure.

16. Responsibility for Completion of Training Forms and Training Requests

Responsibility for completion of forms and requests related to funded occupational skills training is the sole responsibility of CSP staff (Career Coaches, case managers, etc.). This responsibility should never be delegated to the participant. Career Coaches possess expertise regarding ACWDB policies and procedures – and should guide participants through the process of selection of training providers and programs. If CSP staff are unable to provide information to a participant, then they should reach out to their assigned Workforce Technician or the Career Center Coordinator for assistance. Participants should never be directed to contact ACWDB staff to inquire about training programs or policies.

17. Financial Responsibility for Failure to Report Drop from Training Program

In the event that a participant discontinues their participation in a grant-funded training program, it is incumbent upon the Career Coach or the CSP to immediately report to ACWDB through the Training Modification or Training Cancellation processes.

Failure to report the discontinuance in a timely manner may result in the CSP being responsible for some of the costs incurred due to a failure to notify the training provider in a timely manner.

Participants should be alerted that failure to maintain contact with their Career Coach during training may result in the training being cancelled due to inability to confirm attendance.

ACTION:

All ACWDB WIOA service providers must immediately adopt and enact the policies and procedures as outlined in this Action Bulletin. Additionally, this bulletin should be shared with all staff responsible for the provision of WIOA-funded services under the ACWDB.

ACWDB Action Bulletins referenced in this item were the most current available on the date this bulletin was drafted. Any updated information may be located at [ACWDB's Program Policies Page](#).

*Any discrepancies arising between this policy/procedure and federal or state provisions (due to future revisions) will default to the current minimum federal and state regulations and guidance available **until such time that this policy can be updated.***

For information and inquiries please contact:

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