

Mass Workforce Issuance

Workforce Issuance No. 07-51

Policy **Information**

To: Chief Elected Officials
Workforce Investment Board Chairs
Workforce Investment Board Directors
Title I Administrators
Career Center Directors
Title I Fiscal Officers
DCS Associate Directors
DCS Field Managers

cc: WIA State Partners

From: David W. Mackley, Director
Department of Workforce Development

Date: August 3, 2007

Subject: **VWIP Training Funds**

Purpose: To transmit policy guidance to Local Workforce Investment Boards, One-Stop Career Center Operators and other local workforce investment partners with regard to the availability of training funds for eligible veterans under a Veterans' Workforce Investment Program (VWIP) grant awarded to the Commonwealth for Fiscal Year 2008.

Background: The U.S. Department of Labor Veterans Employment and Training Services (DOL/VETS) has awarded the Department of Workforce Development a FY 2008 Veterans' Workforce Investment Program (VWIP) grant to enhance services to veterans. Generally, the goals of VWIP are:

- to provide services to assist in reintegrating eligible veterans into meaningful employment within the labor force, and
- to stimulate the development of effective service delivery systems that address the complex employability problems facing eligible veterans, and expedite their reintegration into the labor force.

In conjunction with the FY 2008 grant award, approximately \$400,000 is being made available to help defray the cost of training services for VWIP eligible veteran customers of the Commonwealth's One-Stop Career Centers.

To be eligible for participation in VWIP, an individual must be a veteran who minimally falls within one of the following categories:

- Veterans with service-connected disabilities;
- Veterans who have significant barriers to employment;
- Veterans who served on active duty in the armed forces during a war or in a campaign or expedition for which a campaign badge has been authorized; and/or
- Recently separated veterans (those within 48 months of discharge).

Generally, in order to utilize VWIP funding to cover all or a portion of the cost, a training program *must increase the employability of the veteran*.

VWIP training funds are available for any classroom training that is *no more than 48 weeks in length and has been designated as “approved” in the MOSES database*.

VWIP funds are not currently authorized for support services such as transportation and housing costs not directly required as part of a training course. Veterans in need of such services are encouraged to contact a city or town Veterans Service Officer (VSO) to determine if other resources are available for such services. The Massachusetts Department of Veterans Services (DVS) oversees the VSOs and can assist with referrals if necessary.

NOTE: Any referrals of VWIP eligible participants to any outside entity including the DVS must be documented in MOSES

Policy:

Prior to enrolling a veteran in the VWIP Program, the veteran must be provided with a level of assessment commensurate with the level of assessment provided for any customer to be approved for training services under the requirements of Title I of the Workforce Investment Act.

One-Stop Career Center staff will request a specified amount of VWIP training funds based on the cost of approved training for each individual VWIP eligible veteran customer. The amount of VWIP funds that may be requested for any individual VWIP eligible veteran will be determined based on a local area’s policy with respect to funding level cap(s) and the availability of other training fund sources such as funding available through the G.I Bill, Title I (including Adult, Dislocated Worker and NEG) and the TAA program (see Attachment A).

Training programs approved for VWIP eligible veterans should not exceed 48 weeks in length. Requests for VWIP training funds for any program longer than 48 weeks must be approved in writing by the DCS VWIP Program Coordinator (see below).

A “VWIP” entry has been added to the training “program approval” listing that is viewable by staff in MOSES. If VWIP funds are to be used for any portion of the training cost the training course *must* be designated as “approved” for the VWIP program. If VWIP funds are requested for a training program deemed appropriate for an eligible veteran under the VWIP program and it has not yet been designated as “approved” for VWIP, the DCS VWIP Coordinator will review the training provider information included in the request and determine if the program can be

designated as “approved” for VWIP. All training programs for which VWIP funds will be used to cover any portion of the training program costs must be designated as VWIP “approved” *in advance* of an individual veteran starting training.

Payment of VWIP training funds to cover the cost for any portion of a veteran’s approved training program will be made to the training vendor directly by Metro South/West Employment and Training Resources (ETR), Inc. The Department of Workforce Development (DWD) has contracted with ETR to administer *all* VWIP training payments to approved vendors. Local areas will only be responsible for covering that portion of an individual VWIP eligible veteran’s training program cost not covered by VWIP funds or any other alternative funding source in accordance with the limitations described below.

If WIA Title I funds are to be used in combination with VWIP funds for a VWIP eligible veteran, the training course must be approved for both WIA Individual Training Accounts (ITAs) as well as for VWIP.

Local areas will assure that policy and procedures of the local workforce investment system, with respect to servicing VWIP eligible customers, are consistent with the following program and procedural elements:

1. In determining VWIP eligibility, Form DD214 must be verified and documented in the Massachusetts One-Stop Employment System (MOSES) in accordance with the requirements described in MassWorkforce Policy Issuance No. 06-33, Use of the DD214 and Other Documentation in Determining Veteran Status (6/2/06).
2. Eligible veterans may be dually enrolled in more than one program. If a veteran is co-enrolled, outcomes will be applied to performance measures for all programs in which the veteran is enrolled.
3. If a VWIP eligible veteran qualifies for tuition benefits under the GI Bill or any other veteran-specific program, or for training under a National Emergency Grant (NEG) or Trade program certification, use of these resources must be explored and VWIP funds requested *only* if these resources are insufficient or unavailable.
4. Veterans enrolled in VWIP programs may also be eligible for services under other Workforce Investment Act (WIA) titles, including those that assist economically disadvantaged or dislocated workers with employment, training and other workforce development services.

In order for VWIP funds to be used in combination with allocated WIA Title I training funds:

- a VWIP eligible veteran must have completed a full assessment in accordance with local Title I eligibility determination policies and procedures and been determined to meet all eligibility requirements for Title I training;

- Title I training funds must be available; and
- The training vendor must be approved for an ITA under Title I

If a veteran is eligible for both VWIP and WIA Title I training funds and both are available, the following rules for combining funding sources will apply:

- If the total cost of the training plan is \$2,400 or less, the cost may be split equally between VWIP and Title I funds, but VWIP funds may not exceed 50% of the total cost.
- If the cost of the training plan is more than \$2,400 but less than or equal to the local area Title I training fund cap, then a maximum of \$1,200 of VWIP funds may be applied to the total cost with the balance paid from the area's Title I allocation.
- If the cost of the training plan is greater than the local area Title I training fund cap, a maximum of \$1,200 of VWIP funds may be applied to the total from VWIP funds, Title I funds may be applied up to an amount not to exceed the local cap level. Any balance must be paid by *other* sources.

NOTE: See Attachment A for examples of the scenarios described above.

5. If as a matter of policy, a local area has implemented more than one WIA training fund cap, the program for which the veteran is enrolled will govern which cap is applied with respect to VWIP eligible veterans. For example, if a local area has one training fund cap for its Dislocated Worker funding allocation and a different cap for its Adult allocation the Dislocated Worker cap will apply if the veteran is enrolled under the Dislocated Worker criteria or the Adult cap will apply if the veteran is enrolled under the Title I Adult eligibility criteria.
6. If Title I training funds *are not* currently available in a local area, VWIP funds may be requested up to an amount not to exceed the level of the local area's established Title I training fund cap. Any balance required to complete the training plan will need to be funded by another source.
7. If the veteran is eligible for VWIP but is *not* eligible for Title I training funds, VWIP funds may be requested up to an amount not to exceed the level of the local area's established Title I training fund cap. Any balance required to complete the training plan will need to be funded by another source.
8. As described in U.S. DOL Training and Guidance Letter (TEGL) No. 5-03 and No. 22-04 (see links below), veterans who meet eligibility guidelines for Adult and/or Dislocated Worker programs under WIA must be given priority of service over other eligible adults and dislocated workers who are not veterans.

http://workforcesecurity.doleta.gov/dmstree/tegl/tegl2k3/tegl_05-03.htm

<http://www.workforceatm.org/sections/pdf/2005/TEGL22-04.pdf>

VWIP grant provisions prohibit any reduction of efforts or elimination of services provided to this targeted population under existing program resources by substituting services or funding provided under VWIP.

9. Regardless of funding source, VWIP-eligible veterans must comply with all local area policies and procedures regarding eligibility and appropriateness for training in order to be approved for training under VWIP.
10. Coordination and collaboration with the Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representative (LVER) staff at the One-Stop Career Center located in the local jurisdiction *is required*. DVOP and LVER staff members are an integral part of the One-Stop Career Centers. DVOP and/or LVER staff must provide case management services to all VWIP-eligible veterans in accordance with WIA Policy Issuance No. 04-34, Case Management for Job Seeker Customers (4/29/04). In addition, DVOP and LVER staff must provide appropriate employment services including job development, job referral and assistance with or referral to job search skill-building activities for veteran customers who are ready to enter employment.
11. LVER and DVOP staff must provide information to veteran customers on services and benefits available through the U.S. Department of Veterans' Affairs (VA) including those related to service-connected disability, compensation and/or pension benefits and eligibility for VA Vocational Rehabilitation and Education (VR&E) programs. Any referrals of VWIP eligible participants to any outside entity including the VA must be documented in MOSES.
12. Local tracking of all VWIP participants' progress in MOSES *is required*. Tracking should begin with enrollment in the Career Center Specific VWIP program and referral to supportive services and training. All Case Management Services must be appropriately documented in MOSES. Tracking must continue through placement into employment and through follow-up at 90, 180 and 270 day intervals. Full tracking through the 270-day follow-up period is a requirement of the grant. All follow-up services must be documented in MOSES.

Action

Required: Local areas will establish policy and procedures with respect to serving veteran customers eligible for services under the Veterans' Workforce Improvement Program in a manner consistent with local area policy and procedures related to assessment, program eligibility determination and enrollment, and with the VWIP criteria and program elements described above.

All Massachusetts Workforce Investment Areas and One-Stop Career Centers will also utilize the attached **Veterans' Workforce Improvement Program (VWIP) Training Voucher Justification Form** to document the individual customer's VWIP eligibility and to request VWIP training funds. Completed Voucher Justification forms must be FAXed to the DCS VWIP Program Coordinator for review and processing at 508-792-7327.

NOTE: The **Veterans' Workforce Improvement Program (VWIP) Training Voucher Justification Form** (Attachment B) is provided in *template* form. To use the form, save it as a template on the hard drive. To create a document for a specific VWIP eligible veteran double click on the template, complete the required entries and save it as an individual file.

Additionally, One-Stop Career Center Operators and partners are encouraged to conduct outreach necessary to introduce the program to eligible veterans. Outreach efforts may include establishing contact with other agencies that serve eligible veterans. The Massachusetts Department of Veterans' Services (DVS) is a principal partner with DCS with respect to the VWIP grant. DVS has oversight responsibilities for all of the Commonwealth's City/Town Veterans Agents. One-Stop Career Center Operators and partners may contact the DCS Statewide Veterans' Program Coordinator, Brian Ottlinger at bottlinger@detma.org or 508-890-3232 to arrange for outreach assistance.

One-Stop Career Centers are also encouraged to conduct orientation workshops and program awareness activities to inform other local service organizations about VWIP. Career centers may also contact Brian Ottlinger for assistance in developing customer and staff program awareness activities.

NOTE: The VWIP program is intended to supplement services generally provided through WIA program operators under Title I of the Workforce Investment Act and the Wagner-Peyser Act, as amended.

Effective: Immediately

Inquiries: Please email all questions regarding the content of this policy to PolicyQA@detma.org. Also, indicate Issuance number and description.