



**STATE OF INDIANA**

**DEPARTMENT OF WORKFORCE  
DEVELOPMENT**

**Formal Communication**

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**TO:** WIB Directors

**FROM:** William R. Miller, Director, WIA Administration

**DATE:** October 8, 2003

**Workforce Investment Act - Technical Assistance Bulletin  
WIA-TAB 2003-002**

**Intensive and Training Services**

Policy & Planning, Evaluation, Operation and Oversight staff met and discussed specific issues related to WIA services and whether those services were training or intensive. Consensus was reached on the following which is being issued as additional guidance to Workforce Investment Boards and their service providers in support of existing laws, regulations and policies.

**Issues:**

A number of issues have been brought to our attention regarding which tier of services specific instructional activities belong in – intensive services or training services. We have reviewed existing law, regulation and policy. Region V, U.S. Department of Labor has provided some verbal guidance to the Department of Workforce Development regarding these issues. Region V had no objections to our clarifications on any of these issues.

Each issue will be stated below followed by the State of Indiana's position on that issue and related comments concerning the position.

**Issue 1 – Are short-term training sessions in “end-user computer” software packages considered intensive or training services?**

Position on Issue 1 -- Since WIA was implemented in Indiana, the State has maintained the same position on this issue. Short-term, end-user computer courses are intensive service under the category of short-term, prevocational training – communication skills.

“End-user computer class/course” means instruction in normal desktop applications including, but not limited to operating systems (Windows 95), use of Internet browser software, introduction to the Internet, word processing (Word, WordPerfect), spreadsheets (Excel, Lotus), presentation software (PowerPoint), calendar & e-mail software and desktop publishing.

An exception to this position may be a client who is obtaining training that will directly lead to certification in a suite of end-user computer products such as MOUS certification (Microsoft Office User Software certification.) In such a case, the client’s occupational goals must directly support the need for that training/certification (secretarial, administrative assistant, help-desk professional, etc.) and the case file must fully document the reasoning/justification for the exception.

#### Comments on Issue 1 --

- + The State’s position is that short-term end-user computer classes/courses are not training for a specific occupation or group of occupations. These classes/courses are essential to many occupations and are very similar to other prevocational, communication skills required of many workers in many occupations in today’s labor market. There are some occupations that may require extensive end-user computer training as an essential part of their occupational training (*see exception*), but these are exceptions to the normal rule.
- + Fundamental end-user computer skills are as basic to educational and occupational success as a high school diploma, a GED, basic reading/writing and communication skills. As such they fit best under the heading of prevocational services.

**Issue 2 -- Skill enhancements - The trainee often does not need a full course of training, but rather a few courses to upgrade their skill sets to make them marketable. An example is welding. A dislocated worker has performed welding for 20 years and has that as a basic skill. Employers in the area have a need for welders with specific welding skills. By sending the individual to one or two welding classes that provide those additional welding skills, the individual becomes highly marketable.**

**Is this a training service?**

#### Position on Issue 2 --

- + These single classes are training services. In the example cited, specific occupational skills were obtained as a result of the training. The skills were recognized and in demand by local employers. The skill gain directly affects the trainee’s market value.
- + Indiana discourages the listing of single classes on the Eligible Training Provider List (ETP.) This could make the list unmanageable and could make tracking performance outcomes extremely difficult for training providers. If an individual only needs specific classes in a course of study, they can select a course of study on the ETP list

that includes those classes and through the ITA process arrange to only take the needed classes.

- + If insufficient courses of study are available through the ETP list, the WIB can solicit additional courses for the list or can directly contract for the training if they follow the process outlined in federal law (20 CFR § 663.430) and state policy (DWD Communications 99-10 issued 09/20/99).

Comments on Issue 2 –

- + Single, occupational training classes are clearly occupational training. As such, they are a training service.

**Issue 3 --An individual wants to take a class to determine whether they are interested in pursuing a career in a specific area. As an example, a client wishes to take a basic introductory class in childcare for the purpose of determining whether they are interested in a career in the childcare industry.**

**Is this single class training? If so, would the single class need to be on the ETP list?**

Position on Issue 3 -

- + DWD does not consider this a training service. In this case, the single class does not provide occupational skills that would lead to securing employment. This is primarily because the class is usually an introductory level course providing minimal occupational skill gains.
- + Single classes addressed by this process more closely fit under the heading of career exploration and as such would be an intensive service. An ITA is not necessary, and selecting a program of study from the ETP list is also not necessary.
- + Please keep in mind that there are other avenues for career exploration, and DWD does not advocate this method as the best approach to career exploration. Often a single introductory class provides only minimal information about careers in an industry or occupational cluster. Job shadowing, work experience, career research through publications and the Internet, and mentoring offer other opportunities for cost-effective career exploration. The final decision on the appropriateness of an introductory class as a means of career exploration resides with the local service providers and the local Workforce Investment Board.
- + If a single class is to be used as career exploration, the case file must clearly state that fact and why this type of career exploration is appropriate.

**Issue 4 -- An individual is receiving training services through a partner agency. The individual is co-enrolled in WIA. WIA is providing supportive services. Near the end of the training program, the primary funding source runs out of training funds and WIA is asked to pay for the additional training classes. The individual is eligible for training services under WIA, but the training program they are enrolled**

**in is not on the ETP list. The partner agency that paid for the early part of the training was not required to use the ETP list. As an example, an individual was within three classes of completing a Bachelor of Science degree. Can WIA pick up the training costs even though the training program is not on the ETP list? Do we force the individual to switch schools and try to transfer credits to a school whose training program is on the list?**

Position on Issue 4 --

- ✦ We cannot pay for the training classes using an ITA unless the training provider is on the ETP list. However, we do have two viable alternatives. First, we can ask the training provider to submit an application for the training program. This is only a viable alternative if the training provider is willing to submit the application and if the training provider is approved. Second, if insufficient training programs of that type are on the ETP list for that area, a WIB can declare that and directly contract with any appropriate training provider after a notice to that effect is posted for a 30-day public comment period. While this might be a viable alternative, it is time-consuming.

Comments on Issue 4 --

- ✦ Within the constraints of the Act, we are left with few good alternatives. The best alternative is to try to get all of the appropriate training programs on the list and to encourage other programs to select their training providers from the ETP list.
- ✦ When working with partners, knowing the limitation of training funds and planning for long-term funding of training could minimize the situations outlined above. As an example, if we know that the partner will run out of training funds prior to the client's completion of school, we could start the process of getting the training program on the ETP list or we could start the exception process for insufficient training providers.

<b>WIA-TAB No.</b>	<b>Subject Matter</b>
2003-000	Workforce Investment Act Technical Bulletins
2003-001	WIA Citizenship and Registration for Selective Services
2003-002	Intensive and Training Services