# Northwest Georgia Workforce Development Board Policy and Procedures Individual Training Account System

### **Notification to Prospective Providers**

Northwest Georgia Regional Commission (NWGRC) is responsible for procurement activities for the Northwest Georgia Workforce Development Board (WDB) and prepares a bidders' list consisting of training providers interested in potentially offering services in the WDB area. Solicitation of bids through an initial public invitation process was accomplished through public notice in the newspapers and the posting of a training provider application on the careerdepot.org web site. Letters of notice of applications were forwarded to all agencies indicated on the bidders' list. Although the solicitation was an open solicitation, further solicitations may be offered on an as-needed basis.

Receipt, logging of applications, and evaluation of responsiveness to the request will occur upon application transmittal to NWGRC. Applications will be reviewed for responsiveness; and a letter of non-responsiveness will be forwarded to training providers, if necessary. Letters will denote reasons for non-responsiveness and information needed to resolve and resubmit the application. If unable to resolve at the staff level, NWGRC will utilize the WDB Executive Committee in the appeals process.

#### **Review and Evaluation**

Training provider applications will be reviewed and evaluated by staff. The evaluation will include the application evaluation elements in the evaluation criteria, pre-award visits to new providers, verification of performance information, employee interviews, participant/student interviews, etc. The comparison to local criteria will include evaluation of stated performance against regional measures. Letters will be forwarded to training providers who fail to submit adequate information and applications may be reviewed upon submission of additional information. If fraudulent or faulty information is received, the application is denied, and an appeal ensues; NWGRC will utilize the WDB Executive Committee in the appeals process.

NWGRC will prepare summary reports on evaluation of training provider applications and submit to the Proposal Review Committee for approval and recommendation to the WDB and CCEO. A composite listing of eligible providers will be forwarded to the Georgia Department of Economic Development—Workforce Division (GDEcD-WD) for approval. Following State approval and listing of eligible providers on the State list, the State will provide letter notification to state-approved training providers. If a training provider is rejected during the initial NWGRC review, NWGRC will notify the bidder. If the bidder subsequently appeals, NWGRC will utilize the WDB Executive Committee in the appeals process. Any appeals based on local policies will be handled by the WDB Executive Committee.

## **Evaluation and Verification of Past Performance of Providers Not Automatically Eligible During** the Initial Eligibility Period

After receiving the eligible training provider application from proposers, NWGRC will review past performance. For applicants providing services under Workforce Innovation and Opportunity Act (WIOA) for the last program year, NWGRC will review Georgia Work Ready Online Participant Portal (GWROPP) reports for past performance evaluation and verification.

Page 1 of 5 ITA System 07/2016

The reports may indicate provider and evaluation data such as completion rate, entered employment rate, average wage at placement, earnings replacement rate, employment in a training-related occupation, and percentage of jobs with benefits. Past performance evaluation will include reviewing data against established performance outcomes measures. State WIOA performance goals, regional goals, and NWGRC goals will be considered in establishing provider performance outcome goals. For all applicants, NWGRC may contact customer references provided in applications to help verify provider data and customer satisfaction. Also, for all applicants, UI Wage Reports may be used to verify employment, employment dates, and wages. Employer references will be verified to ascertain both customer satisfaction and placement outcomes.

## Local Board Criteria for Evaluating the Success and Customer Satisfaction of Organizations on the Eligible Provider List

A quarterly desk review of each eligible provider will address indicators which determine performance outcome measures compared to WDB plan performance outcomes. Those criteria are outlined in the WDB Performance Standards section of the local plan. Customer Satisfaction will be measured utilizing both the performance standards as well as customer satisfaction surveys.

### Process to be used to update the Eligible Provider List

NWGRC will accept and review eligible provider applications throughout the program year. NWGRC will review and evaluate applications using the above-mentioned established process.

Procedures for review and approval of additional programs and price increases for approved training providers will be provided in an initial agreement. These procedures applicable for initial providers not automatically eligible, describe instructions for submitting program/price changes. Procedures for review and approval of additional programs and price increase are described below:

### Procedure for Review and Approval of Additional Programs for Approved Training Provider:

- 1. Training providers should submit the Georgia ETP Application (attached) to NWGRC. Programs included in the application must exist at the time of application and be approved by the NPEC; the program(s) must be currently available to the general public and not solely dedicated/available to WIOA customers. At a minimum the following should be addressed: have at least five (5) students who have completed the program(s) of study and obtained training related employment, an identification of stable employment availability, employee benefits, starting wage, program length, all program costs, and if applicable, any program approval from an accrediting agency/organization and program history. Training providers are encouraged to submit other pertinent program information that may be helpful for review.
- 2. For requested programs that are not associated with demand occupations, training providers should submit to NWGRC the items listed above and three statements from employers verifying they would employ an individual who completes training.
- 3. NWGRC will compare the requested program(s) with other similar programs offered by approved training providers. Areas for comparison include price, length of the program, wage at placement, and provider location.

Page 2 of 5 ITA System 07/2016

- 4. NWGRC will review the training provider's past efforts in providing services to customers. The training provider's success in achieving the WDB performance outcome goals will be reviewed.
- 5. Based on the results of the above steps, staff with either approve or disapprove the request and inform the WDB of the decision and reason at its next meeting.
- 6. NWGRC will notify the provider, in writing, stating conditional approval or disapproval.
- 7. If the results of the review are satisfactory, NWGRC will proceed to make an amendment to the provider's agreement adding the conditionally approved program to the provider's agreement.
- 8. If the additional program(s) is (are) approved, NWGRC will conduct a review of the training provider's success in achieving the appropriate WDB performance outcome goals.
- 9. NWGRC will notify GDEcD-WD upon final approval for inclusion on the state-approved training provider listing.

# Procedure for Review and Approval of Eligible Training Provider Price Increases for Approved Training Providers

- 1. Training providers must submit to NWGRC notification of the price increase(s). Included in the notification should be a justification for the price increase(s) and, if applicable, any accrediting agency/organization that gave approval for these increases.
- 2. NWGRC will review the reasons for the price increase(s), the amount of the increase(s), and the provider's past success in achieving applicable WDB performance goals. The review will be submitted to the Proposal Review Committee for approval and recommendation to the WDB and CCEO.
- 3. NWGRC will notify the provider, in writing, stating approval or disapproval of the price increase(s) request. If approved, a formal amendment to the existing provider agreement will be processed and signed by both parties. Increased prices will not take effect until the amendment is signed and executed.
- 4. NWGRC will forward updated prices to GDEcD-WD for inclusion on the state-approved training provider listing.

### Other Area or Regional Policies for Training Providers

The Georgia Department of Economic Development - Workforce Division (GDEcD-WD), as required by the WIOA, maintains a list of approved training providers and programs in Georgia. All other states maintain a list as well.

- 1. If a training provider located in Northwest Georgia applies to be an Individual Training Account (ITA) provider for the Northwest Georgia Workforce Development Region, the provider and its programs will be investigated by staff and brought before the WDB and CCEOs for approval or disapproval.
- 2. If a State approved training provider in a region located outside Northwest Georgia applies to be an ITA provider for the region, staff will investigate and determine if the provider and its programs are appropriate to provide services for our region. If found

Page 3 of 5 ITA System 07/2016

- appropriate, the provider's application will <u>not</u> be brought before the WDB and CCEO.
- 3. If a training provider in another state applies to be an ITA provider for Northwest Georgia, staff will determine if the provider is on its own State approved ITA Provider List; if it is, staff will investigate and determine if the provider and its programs are appropriate to provide services for our region. Their application, also, will not be brought before the WDB and CCEO for approval.
- 4. If a training provider in another state applies to be an ITA provider for Northwest Georgia and is found to <u>not</u> be on an approved State ITA Provider List, the provider and its programs will be investigated by staff and brought before the WDB and CCEOs for approval or disapproval.

### **Process for Determining Which Customers Receive ITAs**

This area is covered in Training Policies

### **Any Regional Agreements Regarding ITAs**

This area is under review.

## How Training Provider Performance Information will be Gathered, Verified, and Used to Determine Continuing Provider Eligibility

To gather training provider information, NWGRC contractors will contact customers throughout training and during follow-up. After the customer is employed, a career advisor will contact the employer by phone, letter, or e-mail to document performance information such as whether the job is training related, the starting wage, and whether the job offers benefits. The career advisor may refer to customer information taken during intake such as wage at dislocation for assistance in comparing customer entry wage with dislocated wage. The career advisor will conduct follow-up by contacting the customer and/or employer to note customer retention information. All training provider performance related to individual customers will be documented in customer files.

To determine continued eligibility of training providers, NWGRC will compare each training provider's performance data to NWGRC performance measure outcomes. In general, NWGRC will require that each provider's performance meet and/or exceed established WDB performance measure goals. If the goals are met, the training provider agreement may be allowed to continue. For providers that do not meet goals, NWGRC may place them on a limited slots' restriction. Under this restriction, a limited number of customers may be allowed to attend the provider's training; however, once the number has been reached, no other customers may attend training until another review of performance is conducted. Depending on the results of the review, the training provider agreement may be allowed to continue or be terminated.

# Local Policies concerning other Financial Resources for Training (e.g., Pell, HOPE Grant, HOPE Scholarship, TANF, Welfare-to-Work, etc.) and other Linkages/Agreements Regarding Training across the Region

It is the policy of the Northwest Georgia WDB to coordinate WIOA training funds with Pell and HOPE funding. All customers must apply for Pell and HOPE funding, if eligible, and a cost-of-attendance worksheet be completed. Customers should apply as soon as a school is

Page 4 of 5 ITA System 07/2016

selected. Customers may begin training while these applications are in process. If another financial resource subsequently pays for or includes the cost-of-attendance in its financial package, the customer must pay back to WIOA the tuition and/or other duplicate costs of attendance expended on the customer's behalf. This policy applies to those customers who are seeking assistance for funding for schools that provide financial assistance under Title IV of the Higher Education Act and the Georgia HOPE Scholarship Program. If Pell and HOPE funding is denied, documentation of the denial must be included in the customer's file.

Staff will encourage customers to review funding assistance listed on the Georgia Career Information System.

Board Policies Regarding Training Contracts with Community-based Organizations or Other Training Providers with Proven Expertise in Serving Special Populations with Multiple Barriers to Employment and Populations to be served through these Existing Contracts.

Community-based organizations may apply to become eligible training providers by completing and submitting an eligible training provider application. The same method used to evaluate applications submitted by other types of entities will be used for applications submitted by community-based organization.

### **Registered Apprenticeship**

Per directions from the GDEcD – WD, Registered Apprenticeships who request to be placed on the Eligible Training Provider List, are automatically included, as long as their program is registered with the United States Department of Labor (USDOL). They simply have to send their information to a local area, which passes it along to the state to be put on the State ETP list. Registered Apprenticeships are not subject to the same initial application and performance information as regular ITA's, as they are subject to a detailed application and vetting process with the USDOL. When requesting to work with our area, we will still send them a Training Provider Agreement to work with us.

The Final Rule allows apprenticeship programs that are not registered to go through the eligible training provider (ETP) process if they want to be on the ETP list. The rule does not provide apprenticeship programs that are not registered special access to the ETPL. The Registered Apprenticeship application is attached.

Page 5 of 5 ITA System 07/2016