Policy Area: State Workforce Development Board: State Governance 100-05	
Title: Training Services Requirement	**Number:** SWB-100-05-GN1-RV1
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PURPOSE:

This guidance notice outlines detailed instructions and clarifications regarding the forty percent (40%) minimum training expenditure requirement specified in state policy. It is intended to support Local Workforce Development Boards (LWDBs) in accurately interpreting and applying the policy.

BACKGROUND:

The state has established a policy requiring that at least forty percent (40%) of Adult and Dislocated Worker program funds be allocated to training services. This policy is designed to ensure a substantial investment in programs that deliver tangible outcomes, such as recognized credentials, and align with local workforce demands. By prioritizing training that supports high-growth occupations, the policy promotes effective workforce development and contributes to regional economic growth.

To support compliance and minimize administrative burden, the policy clearly defines allowable expenditures—focusing on direct training-related costs while differentiating them from general supportive services. It also streamlines case management and strengthens data tracking to promote accurate reporting and efficient program oversight.

This guidance notice provides LWDBs with clear instructions for implementing the policy while addressing operational concerns and reducing complexity.

REFERENCES:

- State Board Policy 100-05

OVERVIEW OF TRAINING EXPENDITURE REQUIREMENTS:

LWDBs must allocate a minimum of forty percent (40%) of combined WIOA Adult and Dislocated Worker funds—including both Program Year (PY) and Fiscal Year (FY) portions of the formula-funded grant—to training services. These services must.

- **Lead to Recognized Credentials:**
  - Aim to achieve postsecondary education and workforce credentials.
- **Align with High-Growth Occupations:**
  - Address local workforce needs and high-growth job sectors.

TRAINING RELATED SUPPORTIVE SERVICES VS GENERAL SUPPORTIVE SERVICES:

Training related Supportive Services:
These are the services that are directly related to training, as opposed to secondary or more general support, including those that are essential for the participant to engage in and complete the training program itself. *Training related supportive services* ***are allowable*** *towards the forty percent (40%) minimum training expenditure requirements.* Examples include:

- **Tools and Equipment:** Tools, equipment, or uniforms that are ***required*** for the specific training program.
- **Training Materials and Supplies**: Books, manuals, and other materials or supplies that are necessary for participation in the training.
- **Testing and Certification Fees:** Fees for exams, certifications, or licenses that are required to complete the training program or to qualify for a job upon completion.
- **Health and Medical Services Required for Training:** Physicals, drug tests, or immunizations that are mandatory for enrollment or participation in the training program.

General Supportive Services:
These services address various barriers that participants may face and are essential for facilitating participation in training programs, though they do not directly contribute to the training content or curriculum. (e.g., Housing Assistance, Food Assistance, Utility Assistance, Childcare Assistance, etc.) *General supportive services* ***are not allowable*** *towards the forty percent (40%) minimum training expenditure requirement*.

STANDARDIZED TRAINING SERVICE ASSIGNMENT AND TIME ALLOCATION:

The state has adopted a standardized framework for training service assignment and time allocation to promote consistent case management and efficient tracking towards the forty percent (40%) training expenditure requirement. Staff may claim limited hours for designated employer and participant case management activities, with all efforts requiring proper documentation in the MACC system and training tracker.

- **Employer:**
    - Staff may allocate two (2) hours of case management time per employer for activities related to establishing training opportunities. This includes tasks such as:
        - Completing paperwork required to establish training contracts.
        - Gathering and submitting documentation necessary for participation in On-the-Job Training (OJT), Incumbent Worker Training (IWT), or Customized Training (CT) programs.
          **Note: Only two (2) hours may be claimed per executed contract, regardless of the number of participants served under that contract. Additionally, case management time is not allowable if the claim is submitted for a term already covered by an active, valid contract.*
    - All related work must be recorded in the MACC system under the corresponding employer's MACC account. A detailed employer note must be entered to reflect the specific work performed with the employer or training provider.
    - When recording on the training tracker, staff must include the following:
        - Employer Name.
        - Federal Employer Identification Number (FEIN).
        - All other required data elements.
- **Participant:**
    - **Establishing an ITA**
      Staff may allocate one (1) hour of case management time per participant for activities directly related to the establishment of an Individual Training Account (ITA). Allowable tasks include:
        - Coordinating with the training provider to create the ITA .
        - Completing all required documentation (e.g., ITA application, training fund requests, Memoranda of Understanding).
    - **Direct Contact with Participants**
        - Staff may allocate 30 minutes (0.5) hour per participant per interaction for direct contact that involves any of the following:
            - **Training Verification and Barrier Resolution**
                - Confirming that the participant has started training through two-way communication with the participant.
                - Discussions should address:
                    - Barriers such as transportation or access to materials.
                    - Acquisition of supplies, books, or tools.
                    - Financial aid issues or academic progress.

- **Measurable Skill Gains (MSGs)**
    - Reviewing MSG progress directly with the participant.
    - While documentation (e.g., progress reports, grades) is gathered from providers, it must also be discussed with the participant to count toward case management time.
    - Notes may document provider contact, but *without **direct participant interaction**, the 0.5 hour credit cannot be claimed.*
- **Support Services**
    - Reviewing documentation related to support services directly with the participant, including:
        - Attendance verification (for travel reimbursements).
        - Receipts for supplies, books, tools, or other eligible items.
    - Includes assisting with locally required forms for reimbursement.
- **Monitoring Training Progress**
    - Engaging in discussions with participants regarding:
        - Attendance
        - Assignments
        - Understanding course content
        - Overall training performance
    - Claiming service time solely for collecting documents, without reviewing them with the participant, is **not allowable**.
- **Training Completion and Transition Planning**
    - As training concludes, staff must directly connect with participants to:
        - Review graduation or licensing exam requirements.
        - Provide job search support.
    - A final conversation should confirm that the participant no longer needs additional services (e.g., support services) and is ready to transition into employment.

- When recording on the training tracker, staff must include the following:
    - Participant Name
    - MACC ID
    - All other required data elements

TRACKING SERVICES, REPORTING and EVALUATION:

- **Tracking Services:**
  As required by state policy, all applicable program staff must use the state-developed Training Tracker to document training-related services. This Tracker is a living document and must be updated continuously as staff engage with participants, from initial contact through training completion. It should not be completed retroactively at the end of the month.
  - **Obtaining the Tracker:**
    - Because trackers may contain region-specific modifications, the most current digital version must be requested directly from WFWV by emailing WFWVTAC@wv.gov.
  - **Activity Documentation:**
    - Activities should only be recorded once fully completed. *For example, initial setup of an OJT should not be entered until **all** components are finalized and the participant is **ready to begin training**.*
  - **Supporting Documentation:**
    - MACC notes must clearly support allowable activities. If they do not, disallowance reasons will be annotated on the Tracker and returned to WFWV FAM staff and the WDB staff.
      **Note: Only items that meet initial qualifiers will receive detailed explanations for disallowance.*
- **Reporting:**
  WDB staff must submit the fully completed Training Tracker and ensure all claimed services are supported by detailed, corresponding MACC notes.
  - **Submission Requirements:**
    - Use of the WFWV-provided Tracker is mandatory to receive credit for reported case management hours. The completed Tracker must be submitted to WFWVTAC@wv.gov by the 15th of each month for the previous month's activities (e.g., the April Tracker is due by May 15).
      **Note: Trackers submitted after the deadline will not be reviewed for allowability and will be excluded from performance calculations reported to the State Workforce Development Board (SWDB).*
    - Only **one consolidated workbook** will be submitted to WFWV at the designated email address.
      **Note: If the Region chooses to use individual trackers for each staff member, those entries must first be compiled into the state-developed tracker for that*

Region. Only the current Program Year's consolidated workbook is to be submitted, as outlined within this guidance.

- **Evaluation:**
  Once submitted, WFWV Technical Assistance and Compliance staff will review each Tracker entry to determine the allowability of reported time, based on the criteria below:
  - **Qualifiers:**
    **Note: Line items will only proceed to full allowability review if all three conditions (below) are met; otherwise, they will be disallowed without further review.*
    - ***Timely Submission:*** Trackers must be submitted by the close of business on the 15th of each month for the previous month (e.g., the April tracker is due by May 15th).
    - ***Complete and Accurate Data Entry:*** All fields must be fully and accurately completed. Incomplete entries will be disallowed and excluded from the totals reported to the SWDB in the annual performance report.
    - ***Entity Specific:***
      - **Employer/Providers:**
        To ensure program compliance and claim allowability, all executed contracts with Employers/Providers must be properly documented in the Employer's MACC Account file. The following requirements must be met:
        - Upload of Executed Contract
          - A copy of the fully executed contract must be digitally uploaded to the image section of the Employer's MACC Account.
          - The contract should include all required elements listed below.
            **Note: If any required elements are missing from the uploaded contract, they must be documented in the Employer notes.*
            - **Contract Terms**
              - Start and end dates of the agreement.
            - **Service Scope**
              - Job title and position summary.
              - Expected Measurable Skill Gain (MSG), if applicable.
              - Anticipated timeline for training milestones.

- **Review of Reimbursement Process**
    - Stated wage rate(s) for the participant.
    - Agreed-upon reimbursement percentages.
    - Invoicing process and schedule.
- **Roles and Responsibilities**
    - Clear summary of obligations for both the employer/provider and the program.
    - Specific responsibilities of the employer (e.g., timely submission of MSG documentation, progress reports, etc.).
- **Verification of Required Business and Regulatory Documentation**
    - Proof of Workers' Compensation coverage.
    - Proof of Unemployment Insurance registration.
    - Proof of General Liability Insurance, if applicable.
    - Any other applicable regulatory requirements.
- **Participant File: Case Note Requirements**
  **Note: A case note must also be entered in the participant's file to support contract-related activity. The case note must include:*

    - Employer Name or FEIN to link the participant to the employer.
    - A reference to the uploaded contract in the Employer MACC Account file.
    - Any required contract elements not present in the uploaded document (e.g., MSG expectations, reimbursement terms, documentation status).
    - Any additional relevant information specific to the participant's role or training milestones.

        - **Participants:**
          The note must reflect **direct**, two-way interaction with the participant. If this criterion is not met, the entry will be disallowed. *For example, a one-sided email directing a participant to bring in an MSG does not constitute direct contact.*
    - **Full Review:**
      Each entry that satisfies all three (3) applicable qualifiers must also meet all of the following conditions to be considered allowable**.** Entries that do not meet these criteria will be disallowed without further review. *Refer to the Allowable Activities Cheat Sheet for additional guidance.*
        - **Service Documentation:** The claimed interaction must be recorded as a service in MACC with an attached case note.
        - **Tracker Alignment:** The service/note date and staff member listed in MACC must match the information on the tracker.
        - **Justification of Time:** The content of the MACC note must justify the service provided and the amount of time claimed (e.g., 0.5/1/2 hours).
        - **Allowable Timeframe:** Claimed time is only allowable during a participant's active enrollment in a WIOA-funded training component.
            - Time related to assessment, registration, or follow-up is not allowable.
            - Once training is complete, only the completion conversation and closure of the training service may be claimed.
            - Time is allowable if tied to training, even when funded by other sources, if WIOA is providing training related supportive services. There must be a corresponding service entry and detailed case note explaining the funding sources and need for supportive services.
        - **Business Services:** Claims related to employer engagement must be supported with a detailed case note in the Employer MACC Account.

ANNUAL REPORT TO THE SWDB:

The annual report, presented at the Q4 State Workforce Development Board (SWDB) meeting, will provide a summary of grant closeout expenditures for the current program year, based on finalized actuals. *This report will include:*

- **Actual Training Expenditures**: Final figures for training expenditures for the year.
- **Wages and Benefits:** Detailed breakdown of wages and benefits costs related to training activities.

IMPLEMENTATION AND CONTACT:

This guidance is effective immediately. Please review the Training Services Requirement Policy HERE. For questions or clarification, contact WFWVTAC@wv.gov to request a technical assistance call.