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## DEPARTMENT OF LABOR AND EMPLOYMENT DIVISION OF EMPLOYMENT AND TRAINING

WORKFORCE DEVELOPMENT PROGRAMS  
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Category:	Workforce Investment Act
Subject#:	State Definition of Training Services
Source:	Federal/State
Revise/Replace:	None
Contact:	Workforce Development Programs Director
Distribution:	Managers, Workforce Development Staff, Workforce Region Directors,
Colorado One-Stop System Policy Guidance Letter#:	09-11-WIA
Date:	July 7, 2009

### I. REFERENCES

Workforce Investment Act of 1998; 20 CFR Parts 652 et al, Workforce Investment Act, Final Rules; Training and Employment Guidance Letter 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues; TEGL 14-08, Guidance for Implementation of the Workforce Investment Act and Wagner-Peyser Act Funding in the American Recovery and Reinvestment Act of 2009 and State Planning Requirements for Program Year 2009

### II. PURPOSE

To establish policy and provide guidelines on the State's expanded definition of training services; to accurately reflect Colorado's expenditure of funds on training activities; and to alert regions regarding the use of the Skills Upgrade/Retraining (UP) activity code.

### III. BACKGROUND

WIA Section 134(d)(4)(D) states that training services may include:

- (i) occupational skills training including training for nontraditional employment
- (ii) on-the-job training
- (iii) programs that combine workplace training with related instruction, which may include cooperative education programs
- (iv) training programs operated by the private sector
- (v) skill upgrading and retraining
- (vi) entrepreneurial training
- (vii) job readiness training
- (viii) adult education and literacy activities provided in combination with services described in any of clauses (i) through (vii); and

- (ix) customized training conducted with a commitment by an employer or groups of employers to employ an individual upon successful completion of the training

Beginning in September 2006, CDLE began to look at expanding the definition of “training” to more accurately reflect Colorado’s investment in job skills training. JobLink/Connecting Colorado was modified to facilitate tracking and reporting based on the expanded training definition (see Section IV(C)). These changes have implications for the financial report of training costs, and how the regions track training costs in their local fiscal systems.

In February 2009, Congress passed the American Recovery and Reinvestment Act (ARRA). USDOL has issued the following guidance regarding Workforce Investment Act funding in ARRA:

“Because workers may need to up-skill or re-skill to compete for limited career opportunities, training will be a particularly vital service during the economic recovery, and overall training enrollments are expected to increase. Training services may include occupational skills training, on-the-job training, programs that combine workplace training and related instruction, including registered apprenticeship, training programs operated by the private sector, skill upgrade and retraining, entrepreneurship training, job readiness training, adult education and literacy training, and customized training. These funds can also be used to support adult basic education training, including English as a second language.” (TEGL 14-08, Section 11(A), pg 10)

The infusion of ARRA funding into the workforce investment system, and the corresponding expectation of high rates of spending on training activities, has reaffirmed the need to ensure accurate tracking and reporting of training activities and related expenditures.

#### **IV. POLICY / ACTION**

Each local workforce region will track training services in JobLink/Connecting Colorado using the State’s definition of training services; and will report the direct costs associated with those training activities to the state’s financial reporting system utilizing the Colorado definition of training costs, as detailed below:

**A. Colorado Definition of Training** – To more accurately address the types of skills development required by employers, and more accurately reflect Colorado’s expenditure of funds on training activities; Colorado is expanding the definition of a training services to the following:

- (i) occupational skills training including training for nontraditional employment
- (ii) on-the-job training
- (iii) programs that combine workplace training with related instruction, which may include cooperative education programs
- (iv) training programs operated by the private sector
- (v) skill upgrading and retraining *including computer skills upgrades; certification and recertification training*
- (vi) entrepreneurial training
- (vii) job readiness training
- (viii) adult education and literacy activities provided in combination with services described in any of clauses (i) through (vii);

- (ix) customized training conducted with a commitment by an employer or groups of employers to employ an individual upon successful completion of the training
- (x) ***Incumbent worker training***
- (xi) ***GED, diploma, ESL, adult education, literacy, KeyTrain/WIN (or similar) programs (in combination or not in combination with items i-vii above) that are necessary to obtain the employment goal identified in an ISS or IEP***
- (xii) ***Prerequisite and/or remedial education classes required to qualify for entry into vocational or post-secondary training programs***
- (xiii) ***Work experience for adults and youth including summer employment opportunities***

**B. Colorado Definition of Training Costs:** Direct costs associated with any training activities listed in Section II to include:

- (i) Tuition
- (ii) Books
- (iii) Fees
- (iv) OJT reimbursements to employers
- (v) Customized and incumbent worker training costs
- (vi) Work experience wages and stipends
- (vii) Supportive services associated with a training activity
- (viii) Assessment or pre-tests required to enter any of the training programs listed above, including pre and post GED testing and WorkKeys assessments.
- (ix) Tests and fees associated with achieving an occupational license
- (x) Direct costs associated with the provision of training services on-site at workforce centers. This may include overhead, staff time, materials, supplies, etc.
- (xi) Direct costs paid by partners including TAA, Pell, etc. (reported as matching training costs)

**C. Use of the Skill Upgrade/Retraining (UP) Activity Code -** For Federal reporting purposes, Skill Upgrade/Retraining (UP) activities are tracked as a separate subset of Occupational Skills Training (OC). Skill Upgrade/Retraining is defined as:

“Courses that provide an occupational changing type of instruction to prepare persons for entrance into a new occupation through instruction in new and different skills demanded by technological changes. Further, these are courses promoting skills upgrading to train incumbent workers in specific skills needed by that business or industry and that lead to potential career growth and increased wages. This includes courses that develop professional competencies that are particularly relevant to a vocational/occupational goal. It must be demonstrated that the training will result in the workers' acquisition of transferable skills or an industry-recognized certification or credential.”

In order to ensure accurate reporting, staff shall use the UP activity code instead of the OC code to indicate provision of training services that meet the above definition. Use of the UP code will occur most commonly with dislocated workers and incumbent workers.

**D. JobLink/Connecting Colorado Changes –** The Joblink/Connecting Colorado data system has been modified as follows to allow data entry and reporting of the Colorado definition of training:

- (i) The definition of Pre-Vocational Services (PV) has been expanded to include KeyTrain/WIN, and/or requisite and remedial education classes required to qualify for entry into vocational or secondary training programs. PV will continue to be listed in JobLink under Intensive Services to avoid issues with ETP requirements and sequential delivery of services. It will also continue to be reported to USDOL as an intensive service, but will be counted as a training activity on the Activity (AS) Report.
- (ii) The definition of BS (Basic Skills) for youth has been expanded to include secondary school diploma programs. BS is counted as training on the Activity Report, but will continue to be reported it to USDOL as a youth activity.
- (iii) The AS Activity Report has been changed to show WIA defined training services and Colorado defined training services as follows:
  - a. Federal Definition Training
    - i. Adult Literacy Education      AE
    - ii. Certificate Training (Youth)    CT
    - iii. Customized Training            CU
    - iv. Entrepreneurial Training        ET
    - v. Occupations Skills Training    OC
    - vi. On the Job Training             OJ
    - vii. Skill Upgrade/Retraining      UP
  - b. Additional Colorado Training
    - i. Alternative School (Youth)        AS
    - ii. Basic Skills                        BS
    - iii. Pre-Vocational Services        PV
    - iv. Summer Youth Emp. Opp. (Youth) SE
    - v. Tutoring                            TG
    - vi. Work Experience (paid)          WE
    - vii. Work Experience(unpaid)        WU
- (iv) A field has been added to the single service data entry screen that allows entry of the activity code supported by the entered service. This allows for tracking of training related costs. For example, a supportive service or a testing service could be related to OC (occupational training). If OC is entered in the new field and a cost entered for the original supportive or testing service, this cost can be tracked as a training related cost. Staff must be trained regarding this new procedure.
- (v) The Testing (TS) service is now entered via the multiple service data entry screen. This was done to ensure that the additional field described in item (iv) can be entered as needed.
- (vi) On the TM (termination) screen, a check box has been added to indicate whether an entered employment at exit is a training related placement. This check box is in addition to entering an O\*Net code on the TM screen. If the O\*Net on the TM screen does not match the O\*Net entered on any training activity, the check box overrides the mismatch and allows the placement to be counted as training related. Staff must be trained regarding this new procedure.
- (vii) A section has been added to the second page of the Activity Report that lists each of the activity codes counted as training by USDOL and additional codes counted as training by Colorado.
- (viii) “Training-Related Placements” has been added to the first page of the Activity Report. This information comes from a match between the O\*Net code entered

on the TM (termination) screen and the O\*Net code entered with any of the services counted as training on the Activity Report; or it can come from the TM screen check box indicating a training related placement. A distinction is made on the Activity Report between training related placements from the O\*Net match and training related placements from the check box.

**V. IMPLEMENTATION DATE**

Immediately upon receipt of the Program Guidance Letter

**VI. INQUIRIES**

Please direct all inquiries to your State Workforce Liaison at Workforce Development Programs.

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