



# **BOARD OF DIRECTORS MEETING AGENDA PACKET**

**Friday, March 20, 2026**

**9:30 - 11:30 a.m.**

**500 Chadbourne Road, Suite A  
Fairfield, CA 94534**

**WORKFORCE DEVELOPMENT BOARD  
OF SOLANO COUNTY**





**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

**BOARD OF DIRECTORS MEETING**

**Friday, March 20, 2026**

**9:30 a.m. – 11:30 a.m.**

**500 Chadbourne Road, Suite A, Fairfield, CA 94534**

**AGENDA**

- I. Call to Order**
- II. Introductions**
- III. Agenda Changes/Deletions**
- IV. Public Comment** – *Public comments on agenda items and items under the jurisdiction of the Board of Directors shall be made at this time and will be taken into consideration without discussion by the Board. Speakers will have a time limit of 3 minutes. No action may be taken on non-agenda items.*
- V. Closed Session**
  - A. Pursuant to §54957(b)(1) Employee Performance Evaluation
- VI. Open Session**
  - A. Pursuant to §54957.1 Report out on any Action Resulting from Closed Session
- VII. Presentations**
  - A. Presentation by HIRE 1.0 Spokes – Center for Urban Excellence, Mission Samoa, The Uncuffed Project, and Caminar
- VIII. Informational Reports**
  - A. Committee Chairs (Verbal)
  - B. Board Chair (Verbal)
  - C. Leadership Updates (Verbal)
  - D. President/Executive Director Updates (Verbal)
- IX. Consent Calendar**
  - A. Approval of January 23, 2025, Board of Directors Meeting Minutes 1
  - B. Approval of a Second-Year Contract with Charter CFO for Fractional CFO Services, Not to Exceed an Additional Contact Amount of \$21,000, as Recommended by the Budget Committee 7
- X. Action Items**
  - A. Review and Approval of the Eligible Training Provider List Policy (2026-04) 12
  - B. Review and Approval of the Adult and Dislocated Worker Training Contract Policy (2026-05) 38
  - C. Review and Approval of the Supportive Services Policy (2026-06) 58
  - D. Review and Approval of the On-the-Job Training Policy (2026-07) 87
  - E. Review and Approval of the Second Modification to the Fiscal Year 2026-27 Budget, as Recommended by the Budget Committee 106
  - F. Review and Approval of a SCA Youth Summer Program Contract approval 110
  - G. Approval to Authorize the Executive Director to Make Administrative Changes to Internal Policies, as Needed 119
- XI. Discussion**
  - A. Update on Training Providers and ETPL (Working Waterfront and SCC)
- XII. Adjournment**

Note: The next Board of Director’s meeting is scheduled for Friday, May 15, 2026

# CONSENT CALENDAR





**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

**CONSENT CALENDAR AGENDA ITEM IX.A.**  
**March 20, 2026**

<b>SUBJECT</b> Approval of January 23, 2026 Board of Directors Meeting Minutes	<b>ATTACHMENTS</b> NONE
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**RECOMMENDATION**

It is recommended that the Board of Directors approve the minutes of the January 23, 2026 meeting.

**MEETING MINUTES**

**I. Call to Order**

Board Chair, Chris Churchill, called the meeting to order at 8:34 a.m. Quorum was established.

Members Present: Kellie Butler, Chris Churchill, Suzanne Castano, Kelli Courson, Emery Cowan, Mark DeWeerd, Mary Dugbartey, Janice Fera, Henry Funcke, Heather Henry, Coco House, Deanna Hurn, Chris Huxsoll, Catherine (CJ) Johnson, Idowu Koyejo, Glenn Loveall, Summer Miguel, Alicia Mijares, Jamie Powell, Shannon Stack, David Tam

Members Absent: Tim Healer, Margie Poulos, Chris Rico

**II. Introductions**

The Chair introduced Henry Funcke of Sheet Metal Workers Local 104. Mr. Funcke provided a brief overview of his background and role within the organization. He shared that he has been involved in the sheet metal industry and training programs for approximately 46 years, including 35 years working in the trade and over 30 years in training and instruction.

Mr. Funcke currently serves as a Training Coordinator with a focus on outreach, providing information about union apprenticeship opportunities and careers in the building trades. His outreach efforts include engagement with high schools, correctional facilities, juvenile detention centers, homeless shelters, foster youth programs, veterans’ services, and other community organizations to educate individuals about apprenticeship pathways and careers in the building trades.

**III. Agenda Changes/Deletions**

There were no changes or deletions to the agenda.

**IV. Public Comment**

Scott Null from Fairfield-Suisun Adult School addressed the Board. He reported on a recent job fair hosted the previous evening, which was attended by 287 community members, highlighting the continued demand for workforce development services in the community.

Scott also shared information about a planned grant application through the California Community Colleges Chancellor’s Office focused on developing healthcare training pathways for English language learners (ELLs). The project aims to create coordinated workforce pathways in

healthcare and will seek participation from businesses willing to hire program participants, partner agencies that can provide referrals, and organizations that can offer supportive or wraparound services.

He noted that the grant application is due in March, and the Adult School is currently in the early planning stages and seeking interested partners. Board members and partners were invited to connect with him following the meeting if they are interested in participating.

## V. **Informational Reports**

### A. **Committee Chairs**

The Chair reported that the Budget Committee met on January 14. During the meeting, staff presented several recommendations related to the reallocation of funds to address workforce impacts from recent business closures in Solano County. The proposed adjustments primarily involve shifting certain WIOA Adult and Dislocated Worker funds to better align resources with current service needs.

The Chair noted that the committee's review focused on ensuring funds are directed where they are most needed given the changing economic conditions in the region. No major changes to the overall budget were proposed, aside from the recommended internal adjustments.

The Chair also reported that no other Board committees met during this period.

### B. **Board Chair**

The Board Chair provided brief remarks recognizing the efforts of Workforce Development Board staff and leadership. The Chair commended the team for their continued dedication and hard work in supporting workforce initiatives and responding to current challenges within the community.

Specific appreciation was expressed for staff members involved in program operations, outreach, and administrative support, noting the collaborative effort and strong commitment demonstrated across the organization. The Chair commented that the organization continues to operate effectively due to the contributions of the entire team.

### C. **Leadership Updates**

Leadership staff provided updates on recent workforce activities, program operations, and organizational initiatives.

#### *Workforce Response to Layoffs and Closures*

Staff reported on workforce response efforts related to recent WARN notices and business closures in the region. Rapid Response sessions were conducted in early January for employees affected by the Anheuser-Busch closure, with approximately 116 workers attending information sessions. A career fair scheduled for January 29 is planned to support impacted workers, with approximately 18 employers confirmed to participate in two sessions designed to accommodate different worker shifts.

Additional layoffs affecting Mare Island Dry Dock were addressed through a Rapid Response session held January 7, with approximately 17 workers participating. The organization also noted the closure of a CVS location near Lowe's and the recent WARN notice issued by Valero, for which workforce response planning is underway. Staff also

confirmed that the NorCal Career Fair is scheduled for April 2, with a goal of securing 80–90 employers to participate.

#### *Employer Resource Network (ERN)*

Staff provided an update on the Employer Resource Network initiative, which currently operates at two employer sites. Since launching in July of the previous year, the program has assisted approximately 140 employees with resource referrals and support services, including medical resources, childcare assistance, mental health services, and other community-based supports.

#### *Job Seeker Services Updates*

An update was provided on job seeker services, including preparations for the Summer Youth Program, which will be offered for the fourth consecutive year. The five-week program will serve high school youth ages 16–19 and will include work experience, workshops on career exploration, financial literacy, leadership development, and guest speakers from the community.

Staff also highlighted a collaborative effort between the America’s Job Center of California, the Department of Rehabilitation, and partner staff to serve individuals with disabilities. The program currently serves 30 participants statewide, including 20 participants from Solano County. Staff are also preparing for anticipated increases in caseloads due to recent layoffs and closures in the region.

#### *Eligible Training Provider List (ETPL) Expansion*

Leadership reported efforts to expand the Eligible Training Provider List (ETPL) to increase the number and variety of training programs available to participants using WIOA funding. The goal is to strengthen training opportunities in priority sectors including healthcare, construction, manufacturing, public sector, biotechnology, and maritime industries. Staff are currently working with the California Biomanufacturing Center in Vacaville and other partners to develop new training opportunities that may support workers affected by recent layoffs.

#### *Rapid Response and Worker Support Activities*

Staff also provided an update on ongoing support efforts for workers affected by the Mare Island Dry Dock and Anheuser-Busch closures. Additional on-site sessions were scheduled to assist employees with WIOA enrollment, unemployment insurance questions, and job search support. Staff are also working with partner agencies to develop services such as resume and interview preparation workshops, training interest surveys, and connections to supportive services including mental health, financial assistance, and housing resources.

#### *Fiscal and Administrative Updates*

Leadership reported that the Budget Committee meeting was held in January, and staff recently completed the county mid-year budget submission. Preparations for the upcoming fiscal year budget have also begun. Staff also noted organizational transitions due to recent retirements, including fiscal staff changes, and reported that cross-training and onboarding are underway to ensure operational continuity.

#### **D. President/Executive Director Updates**

President/Executive Director, Dave Hubble, provided an update regarding workforce impacts from recent WARN notices and regional economic developments, including closures affecting Mare Island Dry Dock, Anheuser-Busch, and Valero, and ongoing response efforts to support impacted workers. Regarding Mare Island Dry Dock, it was noted that while the closure is moving forward, there have been discussions about the possibility of temporary work continuing to complete existing projects. However, long-term operations are not expected to continue. An Additional Assistance Grant request totaling approximately \$410,000 was submitted to support workers affected by the Anheuser-Busch and Mare Island closures. The request is currently pending state approval. Regarding the Valero refinery closure, the initial WARN notice indicated the company would not coordinate workforce response efforts with the Workforce Development Board. Following discussions with company representatives, the issue was resolved and Valero agreed to work with the Workforce Development Board moving forward. Valero has also contracted with a private vendor to provide basic services such as resume writing and interview preparation, while the Workforce Development Board will provide additional support services to impacted workers.

Updates were also provided regarding efforts to expand the Eligible Training Provider List (ETPL) to increase training opportunities in priority industries including construction, public safety and security, advanced manufacturing, and maritime industries.

Staff are collaborating with the Solano County Office of Education and education partners to better align Career Technical Education (CTE) programs with regional workforce needs. A “Launching Futures Day” event is planned for March 24 to bring together educators, policymakers, and industry representatives to support workforce development planning.

Staff recently met with Employment Development Department (EDD) partners to strengthen coordination between Wagner-Peyser and WIOA Title I services. Discussions also included the potential for future co-location of services to improve service delivery.

Plans were also shared to participate in “Day at the Capitol” in Sacramento on March 3–4 to meet with state legislators and discuss workforce development priorities and economic development efforts in the region.

Additionally, an update will be presented to the Solano County Board of Supervisors on February 3 regarding workforce impacts from recent business closures and the organization’s response efforts.

#### **E. Reports**

There was no further discussion on this item.

### **VI. Consent Calendar**

**A. Approval of November 16, 2025 Board of Directors Meeting Minutes**

**B. Approve the Federal Monitoring and Compliance Oversight Policy (2026-01) as recommended by the Budget Committee**

**C. Approve the revised Corporate Resolutions of Designated Authorized Signatories**

#### **MOTION #1**

A motion was made and seconded to approve the consent calendar, as presented  
**(DeWeerd/Butler) MOTION PASSED UNANIMOUSLY**

**VII. Action Items**

**A. Acceptance of the nomination of Heather Henry, and election to fill the 2024-2026 Board Treasurer Seat**

The Board considered the acceptance of the nomination of Heather Henry to fill the Board Treasurer position for the 2024–2026 term. Board members welcomed Heather Henry and expressed support for her nomination.

**MOTION #2**

A motion was made and seconded to accept the nomination and elect Ms. Henry to fill the Treasurer seat.

**(Loveall/DeWeerd) MOTION PASSED UNANIMOUSLY**

**B. Review and approval of the Lower Living Standard Income Level (LLSIL) & Poverty Guidelines Policy for 2025 (2026-02)**

Staff presented the annual Lower Living Standard Income Level (LLSIL) and Poverty Guidelines Policy update. The policy establishes the income guidelines used to determine low-income eligibility for WIOA Adult and Youth programs. The guidelines are based on data published by the U.S. Department of Labor and the U.S. Department of Health and Human Services.

The Department of Labor publishes the Lower Living Standard Income Level, while the Department of Health and Human Services establishes the federal poverty guidelines. The WDB applies the higher of the two standards, along with household size, to determine low-income eligibility. The policy update reflects the most current income thresholds provided by the federal agencies.

**MOTION #3**

A motion was made and seconded to approve the policy, as presented.

**(Henry/Butler) MOTION PASSED UNANIMOUSLY**

**C. Review and approval of the Property Management and Inventory Policy (2026-03)**

Staff presented the Property Management and Inventory Policy for review and approval. It was noted that there were no substantive changes to the policy itself. The only update reflects a change in the equipment disposition threshold, increasing the amount from \$5,000 to \$10,000 in accordance with updates to federal Uniform Guidance requirements. The updated threshold applies to equipment inventory and disposition procedures, including items such as computers and other equipment.

**MOTION #4**

A motion was made and seconded to approve the policy, as presented.

**(Fera/Castano) MOTION PASSED UNANIMOUSLY**

**D. Review and approval of the proposed transfer of funds from WIOA Adult to Dislocated Worker as recommended by the Budget Committee**

Staff presented a proposed budget realignment to transfer funds from the WIOA Adult program to the WIOA Dislocated Worker program. The proposed transfer reflects current

and anticipated service needs due to recent layoffs and business closures in the region, including impacts from Anheuser-Busch, Mare Island Dry Dock, and Valero.

The recommendation, previously reviewed by the Budget Committee, proposes transferring \$189,731 from the WIOA Adult training allocation to the Dislocated Worker training allocation. The transfer does not increase the overall budget but reallocates existing funds to better support anticipated demand for training services for dislocated workers. Staff also noted that the adjustment supports compliance with WIOA requirements that a minimum percentage of funds be expended on training services.

Additional funding requests have been submitted to the state through multiple Additional Assistance Grant applications; however, those funds are pending approval. The proposed transfer ensures sufficient resources are available to support dislocated workers while awaiting grant determinations.

**MOTION #5**

A motion was made and seconded to approve the policy, as presented.

**(DeWeerd/Castano) MOTION PASSED UNANIMOUSLY**

**V. Closed Session**

At 9:39 a.m., the Board Chair closed the public meeting and adjourned into closed session.

**A. Pursuant to §54957(b)(1) Mid-year check-in on performance objectives and first-year priorities as part of the Executive Director's employee evaluation**

**VI. Open Session**

At 10:33 a.m., the meeting was reconvened.

**A. Pursuant to §54957.6 Vote and/or Report out on an Action Resulting from Closed Session**

**No action was taken by the Board during Closed Session.**

**X. Adjournment**

The meeting was adjourned at 10:26 a.m.

Respectfully submitted by:

Tammy Gallentine, Executive Operations Manager



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM IX.B**

**March 20, 2026**

<p><b>SUBJECT</b> Approval of a Second-Year Contract with Charter CFO for Fractional CFO Services, Not to Exceed an Additional Contact Amount of \$21,000, as Recommended by the Budget Committee; Give Executive Director authority to finalize and execute the contract, and make administrative changes, as needed</p>	<p><b>ATTACHMENTS</b> A</p>
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**RECOMMENDATION**

Staff and the Budget Committee are recommending the Board of Directors approve a second-year contract with Charter CFO for Fractional CFO services, not to exceed an additional contract amount of \$21,000. The cumulative total for the original contract, which began April 1, 2025, and this renewal will not exceed \$42,000. The renewal period will be April 1, 2026, through March 31, 2027.

It is further recommended that the Board authorize the Executive Director, or designee, with the concurrence of County Counsel, to execute this contract and any subsequent amendments which are technical or administrative in nature and have no fiscal impact. Final execution shall be subject to review and approval by the County Administrator. In accordance with the Workforce Development Board’s current Memorandum of Understanding with the County, contracts with an annual amount below \$75,000 may be reviewed and approved by the Solano County Administrator.

The format of the amendment, Attachment A, outlines the updates and/or changes to the contract, as well as the revised term and contract amount of the agreement. All other terms and conditions of the original agreement remain unchanged. The original scope of work and budget have been included as Attachment B for reference. The referenced terms and conditions consist of the standard approved provisions, along with the applicable special terms and conditions, and can be provided upon request.

**BACKGROUND**

In April 2025, the Executive Committee approved a contract with Charter CFO to provide fractional Chief Financial Officer (CFO) services to support the organization’s financial management during a leadership and fiscal transition. At that time, executive leadership changes required the transition of key fiscal responsibilities to internal staff, creating the need for additional executive-level financial expertise to ensure continuity in financial oversight, grant compliance, and fiscal planning.

Services included supporting the development and monitoring of organizational budgets, performing grant budget-to-actual analysis, assisting with financial reporting requirements for major grants, and advising staff on higher-level financial management practices.

In addition, Charter CFO provided technical support during critical fiscal activities, including quarterly financial reporting, year-end close processes, and reconciliation analysis, while working closely with staff to strengthen internal fiscal processes and support the transition of financial responsibilities within the organization.

## **SUMMARY OF CHANGES**

The First Amendment updates the Scope of Work to reflect current fiscal needs and clarify services during the renewal period. Revisions include removal of the previously anticipated quarterly grant closure analysis, addition of year-end fiscal support, and inclusion of support for preparation and filing of the annual IRS Form 990, with a cap of twenty (20) hours unless additional time is approved in advance. The amendment also clarifies that development of annual budgets, including County preliminary and midyear budgets, may be provided as an optional service for an additional fee rather than being included in the base scope of work.

The amendment also revises the Budget and Payment Provisions to align compensation with the updated scope of work. The one-time \$3,500 implementation/transition payment included in the first year of the contract has been reallocated to support preparation and filing of the annual IRS Form 990. The amendment also includes clarifying language regarding invoicing and payment procedures, confirming that services will be invoiced monthly based on the agreed payment structure and that final invoicing will reflect services performed through the end of the contract term.

During the renewal process, the contractor's legal counsel requested clarification regarding certain provisions within WDB's standard General Terms and Conditions related to termination, pricing, invoicing, and contract closeout. Because these provisions are part of the standard contract template approved by Solano County Counsel, WDB addressed the concerns by adding clarifying language to Exhibit B (Budget and Payment Provisions) rather than modifying the standard terms and creating an extensive delay in the execution of the renewal agreement. These clarifications confirm the negotiated hourly rate for additional services, establish that payment determinations are tied to documented services performed and accepted deliverables, and clarify how invoicing and final payment operate within this professional services agreement.

The draft renewal was presented to the Budget Committee at the March 11, 2026 meeting.

## **REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Tammy Gallentine at 707-863-3552 if you have any questions regarding the information outlined in this report.

**FIRST AMENDMENT TO STANDARD CONTRACT PY-25-014  
BETWEEN THE WORKFORCE DEVELOPMENT BOARD OF SOLANO COUNTY AND  
CHARTER CFO**

This First Amendment ("First Amendment") is entered into as of the first day of April 2026, between the WORKFORCE DEVELOPMENT BOARD OF SOLANO COUNTY ("WDB") and CHARTER CFO, ("Contractor").

1. Recitals

- A. The parties entered into a contract dated April 1, 2025 (the "Contract"), in which the Contractor agreed to provide fractional CFO services through March 31, 2026.
- B. WDB now needs to extend the Contract for services for twelve months, through March 31, 2027.
- C. This First Amendment represents an increase of \$21,000 for services and a twelve-month extension of the Contract.
- D. The parties agree to amend the Contract as set forth below.

2. Service Agreement

A. Term of Agreement

Section 2 has been deleted in its entirety and replaced with:

The term of this Contract is: April 1, 2025 through March 31, 2027

B. Budget

Section 3 has been deleted in its entirety and replaced with:

The Maximum amount of this contract is \$42,000 (\$21,000 from the original contract; and \$21,000 for this First Amendment).

3. Scope of Work (Exhibit A)

- A. The Service Activities (section 2) has been deleted in its entirety and replaced with:

Contractor will provide the following services during the term of this Contract:

- i. Budgeting Services
  - a. Conduct regular year-round budgeting services for the WDB to include budget modifications, as needed.
  - b. Conduct monthly budget versus actual analysis of WDB budgets.
- ii. Accounting Compliance, Analysis, and Technical Assistance
  - a. Conduct monthly compliance and process review / oversight.
  - b. Conduct weekly, or at a mutually identified frequency, Same Page Meetings with WDB's fiscal leadership liaison.
  - c. Develop a high-level, twelve-month deliverables roadmap, in addition to a quarterly (or necessary) deliverables roadmap

- d. Serve as liaison for Annual Single Audits with the County Auditor-Controller's office, as needed
- e. Provide year end support, as needed
- f. Support, or lead as needed, the preparation and filing of the annual IRS 990 (not to exceed twenty (20) hours). Any additional time required will be billed at the Contractor's hour rate upon prior approval by WDB.

iii. Additional Services for Additional Fee

The following services are not included in the base scope of work and may be provided for an additional fee upon prior written approval.

- a. Develop annual budgets to include County preliminary and midyear budgets.

4. Budget and Payment Provisions (Exhibit B)

A. Exhibit B has been deleted in its entirety and replaced with:

**COMPENSATION**

1. Contractor will be compensated as follows:

- A. \$2,500.00 in months where quarterly grant reporting is necessary (July 2026, October 2026, January 2027)
- B. \$800.00 in months where quarterly grant reporting is not required.
- C. \$3,500.00 upon successful filing of the annual IRS Form 990.

2. Contractor will provide additional services outlined in Exhibit A upon mutual approval of the number of hours prior to the work being performed. Approved services will be billed at an hourly rate of \$175.00, as negotiated based on the scope and complexity of services.

3. Invoicing and Timing of Payment: Payment will be made according to the following terms:

- A. Contractor shall submit monthly invoices detailing work performed during the invoicing period based on the Scope of Work and amount payable to the WDB. Payment shall be made only after the services required under this contract have been performed satisfactorily and the deliverables described in Exhibit A have been accepted in writing by the Executive Director or designee. In the event of termination, Contractor may invoice for services satisfactorily performed through the effective date of termination in accordance with the terms of this Exhibit.
- B. Contractor may be asked to perform special tasks or projects separate from the Scope of Work. Prior written approval by WDB will be required before any services are performed not specified in Exhibit A are performed by Contractor. Such invoices shall be invoiced separately.
- C. Contractor shall provide documentation reasonably requested by WDB to substantiate claims for payment under this Contract. WDB may elect to withhold payment for unsupported charges until such documentation is provided.
- D. Tax Withholding: Payment to non-California resident or nonresident alien Contractor performing services in California may be reduced by any required state tax withholding or federal tax withholding or both.

E. The parties acknowledge that Contractor will provide ongoing services outlined in Exhibit A and will invoice WDB monthly in accordance with the payment structure set forth in Section 1 (Compensation) of this Exhibit. The final invoice shall reflect the past period of services performed and any approved payments due.

Under no circumstances shall the total compensation under this Contract exceed \$42,000 unless modified in accordance with Section 26 in Exhibit C.

Except as set forth in this First Amendment, all other terms and conditions specified in the Contract, and as previously amended, remain in full force and effect.

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Davide A. Hubble, President/Executive Director  
Workforce Development Board of Solano County

Approved as to Form:

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Solano County Counsel

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Candice Phillips, MBA, Managing Partner  
Charter CFO

Approved for Solano County:

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Ian M Goldberg, County Administrator  
Solano County

# ACTION ITEMS





**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM X.A**

**March 20, 2026**

<p><b>SUBJECT</b> Review and Approval of the Eligible Training Provider List Policy (2026-04)</p>	<p><b>ATTACHMENTS</b> A, B, C</p>
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**RECOMMENDATION**

Staff recommend the review and approve WDB Policy 2026-04 Eligible Training Provider List (ETPL) Policy, as revised.

Attachment A – redlined version of policy 2019-11

Attachment B – draft version of revised policy 2026-04

Attachment C – summary of changes

**DISCUSSION**

To ensure continued compliance with the Workforce Innovation and Opportunity Act (WIOA) and related programmatic and administrative requirements, the Workforce Development Board (WDB) of Solano County periodically reviews and updates its policies as needed. During Program Year (PY) 2024–25 WIOA monitoring, an Employment Development Department (EDD) monitor identified areas within the WDB’s ETPL Policy 2019-11 that required clarification and updates. In addition, on February 23, 2026, EDD issued Workforce Services Directive WSD25-02, California Eligible Training Provider List, which required updates to the WDB’s ETPL Policy, originally adopted on November 15, 2019.

In response, staff conducted a comprehensive review of the policy and made revisions to align it with current federal and state requirements. The updates ensure consistency with WIOA and Uniform Guidance provisions and remove outdated or rescinded federal and state references, replacing them with current guidance.

**OVERVIEW**

This policy outlines the requirements and process to become an eligible training provider, including organizational requirements, eligibility criteria, and guidelines for maintaining ETPL status. The workforce development system established under WIOA emphasizes informed consumer choice, job-driven training, provider performance, and continuous improvement.

The policy was updated to align with current federal regulations and state guidance issued through Workforce Services Directive WSD25-02. Revisions modernize the policy, clarify administrative responsibilities, and ensure alignment with current state processes governing the ETPL.

Updates clarify the respective roles of the State and the Local Workforce Development Board in administering the ETPL, including the State’s responsibility for maintaining the statewide list and establishing eligibility criteria, and the Local Board’s role in reviewing training provider applications, conducting eligibility reviews, and overseeing local ETPL administration. The policy also formalizes the role of a local ETPL Coordinator responsible for managing ETPL activities and maintaining required documentation.

The revisions strengthen language supporting informed consumer choice and alignment of training programs with labor market demand. The policy clarifies that training providers must meet applicable operating requirements and submit program and performance information required for ETPL reporting through the State's designated system. Provisions related to Registered Apprenticeship Programs were also updated to reflect their automatic eligibility for inclusion on the ETPL under federal law.

Additional updates address the process for maintaining eligibility and oversight of training providers. Language was revised to reflect current state reporting requirements, clarify timelines for eligibility review, and streamline monitoring provisions by referencing established procedures rather than embedding operational details within policy. The policy also clarifies the authority to deny, suspend, or remove providers or individual programs from the ETPL while ensuring due process through appeal rights.

Overall, these revisions ensure the policy reflects current regulatory guidance, supports transparency for participants selecting training programs, and provides clear administrative structure for ETPL oversight.

**REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Cynthia Seals-Roper at 707-863-3591 if you have any questions regarding the information outlined in this report.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: ~~November 15, 2019~~ March 20, 2026 Number: ~~2019-11~~ 2026-04

### ELIGIBLE TRAINING PROVIDER LIST (ETPL) POLICY

#### INTRODUCTION

This policy provides guidance to the Workforce Development Board (WDB) of Solano County and prospective ETPL vendors in the development and selection of eligible training providers in our local area. The quality and selection of providers and programs of training services, including Registered Apprenticeship programs and others, is vital for enrolled Workforce Innovation and Opportunity Act (WIOA) participants in achieving their individual training goals and subsequent employment. The ETPL and the related eligibility procedures ensure the accountability, quality, and labor-market relevance of programs of training providers that receive funds through WIOA Title I. WIOA requires the State to establish eligibility criteria and procedures for a State Eligible Training Provider List (ETPL), who in turn outlines local workforce area responsibilities regarding eligible training providers.

#### QUESTIONS

Questions relating to this policy should be directed to ~~Marion Aiken, Workforce Services Manager, at [maiken@solanowdb.org](mailto:maiken@solanowdb.org) or (707) 863-3594~~ Cynthia Seals-Roper, Industry & Training Relations Manager, at [croper@solanowdb.org](mailto:croper@solanowdb.org) or (707) 863-3591.

#### RECISSIONS

This policy replaces and cancels the 2019-11 Eligible Training Provider List (ETPL) Policy.

#### POLICY

This policy outlines the requirements and process to become an eligible training provider, including organizational requirements and eligibility criteria, as well as guidelines for maintaining ETPL status. The workforce development system established under WIOA emphasizes informed consumer choice, job-driven training, provider performance, and continuous improvement.

An eligible training provider is a provider of training services who has met the eligibility requirements to receive WIOA Title I Adult, Dislocated Worker, and Youth funds via an Individual Training Account (ITA) to provide training services to eligible individuals. ITAs are permitted for older out-of-school youth, ages 18-24, when appropriate. To provide WIOA-funded training through an ITA, both the training provider and each training funded

must be registered on the ETPL. All training providers shall comply with the respective criteria, information requirements, and procedures established within this policy. All training providers must qualify as eligible providers, except for those training services exempt from eligibility requirements as outlined in the WDB policy on ITAs.

Training services funded under WIOA Title I Adult, Dislocated Worker, and eligible Out-of-School Youth programs shall be provided in a manner that maximizes informed consumer choice. Eligible participants, in consultation with a career planner, may select training programs from providers listed on the ETPL that align with their employment goals and career pathway.

## STATE VS. LOCAL RESPONSIBILITY

### **State Responsibility**

The State of California is responsible for establishing ETPL criteria, information requirements, and procedures that govern the eligibility of providers and programs on the ETPL. The State is also responsible for maintaining the ~~state~~ California Eligible Training Provider List (list of providers and programs, accompanied by performance and cost information per program) and ensuring programs meet the criteria, eligibility, and performance levels for eligible training providers as established by the state. The State has authority to remove programs from the ETPL that don't meet program criteria or performance levels, as well as to take appropriate enforcement actions against providers regarding fraud.

### **Local Responsibility**

The WDB is responsible locally for carrying out the ETPL procedures prescribed by State. The WDB is also responsible for working with the State to ensure sufficient numbers and types of providers of training services locally, including eligible providers with expertise in serving individuals with disabilities and eligible providers with expertise in serving adults in need of adult education and literacy activities. Staff are responsible for ensuring dissemination and appropriate use of the state's ETPL throughout the local one-stop service delivery system, including providing formats accessible to individuals with disabilities. The WDB is also responsible for ensuring compliance of locally used ETPL providers.

The WDB will designate a Local ETPL Coordinator responsible for carrying out responsibilities related to the administration of the ETPL and for providing technical assistance to training providers regarding ETPL requirements.

The WDB has authority to supplement criteria and information required by the State for programs used within the local area to support informed consumer choice and the achievement of local performance indicators, with the exception of Registered Apprenticeship programs. Supplemental criteria and information may include information on programs of training services linked to occupations in demand, performance and cost

information, information that shows how programs are responsive to local requirements, and other appropriate information. Any supplemental criteria and information required at the local level will be outlined in procedures and posted on the WDB website (<http://solanoemployment.org>).

## ETPL TRAINING ELIGIBILITY

### Training Providers

To be an eligible training provider on the ETPL, an entity must qualify as one of the following:

1. An institution of higher education that provides a program leading to a recognized post-secondary credential;
2. An entity that carries out programs registered under the National Apprenticeship Act. ~~;~~ or Registered Apprenticeship Programs registered with the U.S. Department of Labor Office of Apprenticeship or a recognized State Apprenticeship Agency are automatically eligible for inclusion on the ETPL. These programs are not subject to the same initial eligibility application requirements as other training providers; however, the program sponsor must consent to be listed on the ETPL; or
3. A public or private provider of a program of training services, which may include joint labor-management organizations, community-based organizations, and eligible providers of adult education and literacy activities under WIOA Title II, if such activities are provided in combination with occupational skills training.

Training providers must be a legal entity registered to do business in California and offer training programs ~~that lead to a high-demand occupation that prepare participants for employment opportunities.~~ Training providers must also meet California operating requirements applicable to the type of institution, including accreditation requirements for institutions of higher education or approval to operate by the California Bureau for Private Postsecondary Education (BPPE), when applicable. Training providers must also be able to show compliance with the requirements at time of new provider registration:

1. Have the ability to:
  - a. Offer programs that lead to recognized postsecondary credentials;
  - b. Meet the needs of local employers and participants; and
  - c. Serve individuals with barriers to employment.
2. Have refund policies specifying when refunds for tuition and other costs associated with the training program will be allowed. Refund policies must be written and published so students are aware of how to request a refund;

3. Have a grievance policy which provides for due process for students to file complaints with an organization against faculty, staff, or other employees. Grievance policies must be written and published so that students are aware of how to file a complaint;
4. Be financially stable;
5. Can maintain WIOA training participant records and make those records available for monitoring or auditing purposes;
6. Can comply with non-discrimination and equal opportunity provisions of the following laws:
  - Regulations under Section 188 of the Workforce Innovation and Opportunity Act
  - 29 CFR 37, Title VI of the Civil Rights Act of 1964;
  - Age Discrimination Act of 1998;
  - Sections 504 and 508 of the Rehabilitation Act of 1973;
  - Title IX of the Education Amendments of 1972;
  - Title II Subpart A of the American with Disabilities Act of 1990; and
  - The Genetic Information Nondiscrimination Act of 2008.

Training providers must post Equal Employment Opportunity and Non-Discrimination procedures at their facilities.

7. Not be currently debarred by the state or federal government.

7.8. Provide required performance and program information for each approved training program in accordance with state reporting requirements for the ETPL.

The WDB must ensure that there are no conflicts of interest between the WDB and the training provider, including a prohibition on payment of referral fees by training providers to WDB or America's Job Centers of California (AJCC) staff.

### **Training Programs**

Eligible training on the ETPL is defined as one or more courses or classes, or a structured regimen that leads to:

Training programs should demonstrate alignment with in-demand industry sectors or occupations based on labor market information.

1. An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state or the federal government, an associate or baccalaureate degree;

2. A secondary school diploma or its equivalent if provided concurrently or in combination with occupational skills training;
3. Employment; or
4. Measurable skill gains toward a credential.

Examples of training services required to be on the ETPL include:

1. Occupational skills training, including training for nontraditional employment;
2. Skills upgrading and retraining;
3. Entrepreneurial training;
4. Job readiness training provided in combination with services listed in this section;
5. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with training services listed in this section;

Examples of training services that do not require inclusion on the Eligible Training Provider List include:

1. Short-term pre-vocational training;
2. Workforce preparation training, as defined by 20 CFR 678.430 (b.08);
3. Avocational training (for fun, recreation, or non-job-related);
4. Subscription or membership fee based self-paced training; and
5. Training that consists only of materials purchased for a fee and is self-paced.

## ETPL APPLICATION PROCESS

### **New Training Providers**

All providers that have not previously been eligible to provide training services under WIOA Sec. 122, except for registered apprenticeship programs, must submit required information to be considered for initial eligibility. The requirements to become an eligible provider of training services apply to all organizations providing WIOA Title I training to adults and dislocated workers, ~~with the specific exception of Registered Apprenticeship programs. For Registered Apprenticeship programs~~ registered with the U.S. Department

~~of Labor Office of Apprenticeship or a recognized State Apprenticeship Agency are automatically eligible for inclusion on the ETPL upon request and will remain on the list as long as the program remains registered., WIOA states that Registered Apprenticeship programs must be included upon request and maintained on the list of eligible training providers for as long as the program remains registered.~~

Private post-secondary training providers are required to meet the Bureau of Private Postsecondary Education (BPPE) standards to become and remain eligible under the Directory of Approved Institutions. For additional information about the BPPE requirements, log on to: <https://www.bppe.ca.gov/>. Private post-secondary training providers must submit an "Approval to Operate" from the BPPE as part of their initial application process.

~~All ETPL training providers must be registered in the CalJOBS ETPL module (see the WDB website for step-by-step instructions). Training providers seeking eligibility must submit their provider and training program applications through the CalJOBS ETPL module.~~ Upon registration, the WDB ETPL Coordinator will review and give the training provider access to enter course information for their respective training programs.

### **Training Programs**

An initial eligibility determination will be conducted for each training provider on a program by program basis; there is no blanket approval for all programs offered by a provider. Training providers applying to have their programs be considered eligible must provide the following information for each training program:

1. A description of the training program;
2. Program cost information, including tuition and fees;
3. Evidence of state licensure requirements of training providers, and licensing status of providers of training services, as applicable;
4. ~~The high-demand occupation for which the training program prepares the student, as defined as having more than the median number of total (growth plus replacement) openings statewide or for a particular region~~Labor market information identifying the occupation or employment opportunities for which the training program prepares participants;
5. Information on whether the training provider has partnerships with business and connects the training program to employment opportunities. The information may include whether the training program is offered or was designed as a result of the partnership, or may include a list of employers that have committed to hire graduates from the training program;

6. Information regarding how successful completion of the program results in or leads to a federally or locally recognized credential;
7. Description of the accessibility of training services (i.e., is this program of study a facility-based training, or is it accessible throughout the state, to individuals in rural areas, through the use of technology);
8. Description of the program's demonstrated effectiveness in serving employed individuals and individuals with barriers to employment; and
9. ~~The following performance data:~~ Performance information required for the ETPL, as defined by state reporting requirements.
  - ~~Number of students completing training program~~
  - ~~Number of students obtaining a credential within one year after program completion~~
  - ~~Number of students in unsubsidized employment second quarter after exit~~
  - ~~Number of students in unsubsidized employment fourth quarter after exit~~
  - ~~Median hourly wage at placement.~~

The WIOA Training Provider Application (which can be found on the WDB's website) is designed to capture all relevant information about the provider and training program. The ~~local~~ ETPL Coordinator listed on the website will provide assistance and guidance to training providers on the application process. The ETPL Coordinator ~~must keep all training will maintain documentation related to~~ provider and ~~training program eligibility documents for locally sponsored training programs~~ determinations in accordance with applicable record retention requirements.

~~Training providers offering distance learning courses must submit their training program application to the state ETPL Coordinator. Training providers must submit ETPL applications in accordance with the state assignment process. The Local Board where the training provider's headquarters is located is responsible for reviewing and nominating the provider's profile. If the training provider's headquarters is located out of state, the Local Board where the training program is physically located must review and nominate the provider's profile. The Local Board where the training program is physically located must conduct the eligibility review for the program(s), including programs delivered online, and ensure the application is complete and the program meets state eligibility requirements prior to approving the application for state review. Local Boards are not responsible for eligibility determinations for Registered Apprenticeship Programs (RAPs) or out-of-state training providers.~~

## MAINTAINING ETPL STATUS

All training providers on the ETPL will be evaluated ~~annually~~ to ensure they continue to meet eligibility to be retained on the ETPL. Initial eligibility for a program expires within one year of approval, and the first continued eligibility review must occur within one year to avoid a lapse in approval. Continued eligibility may be granted for up to two years in accordance with state ETPL requirements. To determine ~~subsequent continued~~ eligibility, the WDB ETPL Coordinator and ~~the State EDD~~ will verify that the training provider continues to meet ~~or exceed the negotiated state level Title I Adult performance goals for Employment Rate—2<sup>nd</sup> Quarter, Credential Attainment, and Measurable Skill Gains~~ state eligibility requirements for inclusion on the ETPL. The performance calculations for each program ~~is~~ are based on WIOA-funded participants only and is verified using the federal ETP report published by the state. Training providers must submit required performance information in accordance with state reporting requirements for the ETPL.

~~The WDB will conduct annual monitoring of locally used ETPL providers. Monitoring will include ensuring instructors maintain proper credentialing or expertise; actual instruction is taking place; instructional equipment and training meets current industry standards; programs provide credentials, certifications and/or skills that are valued by employers within priority industry sectors; and compliance with non-discrimination and equal opportunity provisions. Other monitoring elements may be added at the WDB's discretion. The WDB may utilize monitoring conducted by other local workforce areas to show compliance of training providers to reduce duplicative monitoring. The WDB will conduct oversight and monitoring of locally utilized Eligible Training Providers to ensure compliance with applicable federal and state requirements. Monitoring activities will be conducted in accordance with established procedures.~~

## DENIALS AND REMOVALS FROM THE ETPL

A training provider or training program may be denied initial or continued eligibility or removed from the ETPL by the sState or denied request by the WDB for the following reasons:

1. The application is not complete, or information was not provided in a timely manner;
2. The training program does not meet the definition of training services as defined in this policy;
3. Required Pperformance data information is not provided or does not meet the minimum performance measures or data is not provided with application applicable state reporting requirements;
4. The training provider is not in compliance with WIOA regulations, or any agreement executed under WIOA;

5. The training program does not meet the eligibility requirements as outlined in this policy; or
6. It is determined that the training provider intentionally supplied inaccurate information.

Providers determined to have intentionally supplied inaccurate information or to have substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38, will be removed from the state list of eligible training providers and programs for not less than 2 years and is liable to repay all youth, adult, and dislocated worker training funds it received during the period of noncompliance. When a program of training is removed from the state ETPL, WIOA participants currently enrolled in the program with the support of an ITA may complete their training unless the provider or program has lost state licensure, certification, or authorization to operate by the appropriate state oversight agency.

The WDB may temporarily suspend a training provider or training program from the ETPL while concerns regarding compliance, accuracy of information, or other eligibility requirements are reviewed. During a period of suspension, the provider or program may not receive new WIOA-funded participants until the issue has been resolved.

If the WDB denies a training provider or training program for inclusion on the ETPL, or removes a training provider or training program from the ETPL, the ETPL Coordinator will inform the training provider in writing within 30 days of the application and include the reason(s) for the denial, as well as provide information on the local appeal process. If the State denies a training provider's listing, they will notify the WDB within 30 days of receipt of the nomination, who in turn will notify the training provider within 30 days of notification from the State.

If a training provider becomes unable to continue delivering training services due to closure, loss of licensure, or other operational failure, the WDB will work with affected participants to identify comparable training opportunities with other ETPL providers and ensure continuity of services to the extent possible.

### **Requests for Appeal**

Training providers may file appeals with the WDB regarding the denial of a provider's application for initial or continued eligibility, the suspension of eligibility, or the removal of a provider or program from listing on the ETPL, or for the removal of a program(s) already listed on the ETPL.

All appeals must be submitted in writing within 30 calendar days from the date of the rejection notice or notice of suspension of eligibility. The request for an appeal hearing must include:

- A statement of the desire to appeal;

- The name, address, and telephone number of the training provider;
- A description of the adverse action; and
- Detailed explanation of the reasons claimed that the denial or removal was erroneous.

Such appeals must be addressed to:

Workforce Development Board of Solano County  
 c/o ETPL Coordinator  
 500 Chadbourne Rd, Suite ~~100~~ A  
 Fairfield, CA 94534

An appeals resolution will be scheduled within 60 days of the date the appeal request was received.

## REFERENCES

### Law

- Workforce Innovation and Opportunity Act of 2014 (WIOA), Public Law (Pub. L.) 113- 128, enacted July 22, 2014

### Federal Guidance

- ~~WIOA Title I sec. 116 & sec. 122; 20 CFR Part 680 §680.400—§680.510~~
- Training and Employment Guidance Letter (TEGL) 41-14 – [WIOA Title I Training Provider Eligibility](#) and TEGL 41-14, [Change 1](#)
- [WIOA Title I Sections 116, 122, and 134\(c\)\(3\)\(G\)](#)
- [20 CFR Part 680 Subpart D – Eligible Training Providers \(§680.400-680.530\)](#)
- [20 CFR §680.340 Consumer Choice Requirements](#)

### State Guidance

- Workforce Services Directive (WSD) ~~15-07 – WIOA Eligible Training Provider List – Policy and Procedures 25-02 – Eligible Training Provider List~~

### Approved by

Workforce Development Board of Solano County



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
ELIGIBLE TRAINING PROVIDER LIST (ETPL) POLICY  
(Issued March 20, 2026)

The Workforce Development Board (WDB) of Solano County's Eligible Training Provider List (ETPL) Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Eligible Training Provider List (ETPL) Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: March 20, 2026 Number: 2026-04

### ELIGIBLE TRAINING PROVIDER LIST (ETPL) POLICY

#### INTRODUCTION

This policy provides guidance to the Workforce Development Board (WDB) of Solano County and prospective ETPL vendors in the development and selection of eligible training providers in our local area. The quality and selection of providers and programs of training services, including Registered Apprenticeship programs and others, is vital for enrolled Workforce Innovation and Opportunity Act (WIOA) participants in achieving their individual training goals and subsequent employment. The ETPL and the related eligibility procedures ensure the accountability, quality, and labor-market relevance of programs of training providers that receive funds through WIOA Title I. WIOA requires the State to establish eligibility criteria and procedures for a State Eligible Training Provider List (ETPL), who in turn outlines local workforce area responsibilities regarding eligible training providers.

#### QUESTIONS

Questions relating to this policy should be directed to Cynthia Seals-Roper, Industry & Training Relations Manager, at [croper@solanowdb.org](mailto:croper@solanowdb.org) or (707) 863-3591.

#### RECISSIONS

This policy replaces and cancels the 2019-11 Eligible Training Provider List (ETPL) Policy.

#### POLICY

This policy outlines the requirements and process to become an eligible training provider, including organizational requirements and eligibility criteria, as well as guidelines for maintaining ETPL status. The workforce development system established under WIOA emphasizes informed consumer choice, job-driven training, provider performance, and continuous improvement.

An eligible training provider is a provider of training services who has met the eligibility requirements to receive WIOA Title I Adult, Dislocated Worker, and Youth funds via an Individual Training Account (ITA) to provide training services to eligible individuals. ITAs are permitted for older out-of-school youth, ages 18-24, when appropriate. To provide WIOA-funded training through an ITA, both the training provider and each training funded must be registered on the ETPL. All training providers shall comply with the respective

criteria, information requirements, and procedures established within this policy. All training providers must qualify as eligible providers, except for those training services exempt from eligibility requirements as outlined in the WDB policy on ITAs.

Training services funded under WIOA Title I Adult, Dislocated Worker, and eligible Out-of-School Youth programs shall be provided in a manner that maximizes informed consumer choice. Eligible participants, in consultation with a career planner, may select training programs from providers listed on the ETPL that align with their employment goals and career pathway.

## STATE VS. LOCAL RESPONSIBILITY

### **State Responsibility**

The State of California is responsible for establishing ETPL criteria, information requirements, and procedures that govern the eligibility of providers and programs on the ETPL. The State is also responsible for maintaining the California Eligible Training Provider List (list of providers and programs, accompanied by performance and cost information per program) and ensuring programs meet the criteria, eligibility, and performance levels for eligible training providers as established by the state. The State has authority to remove programs from the ETPL that don't meet program criteria or performance levels, as well as to take appropriate enforcement actions against providers regarding fraud.

### **Local Responsibility**

The WDB is responsible locally for carrying out the ETPL procedures prescribed by State. The WDB is also responsible for working with the State to ensure sufficient numbers and types of providers of training services locally, including eligible providers with expertise in serving individuals with disabilities and eligible providers with expertise in serving adults in need of adult education and literacy activities. Staff are responsible for ensuring dissemination and appropriate use of the state's ETPL throughout the local one-stop service delivery system, including providing formats accessible to individuals with disabilities. The WDB is also responsible for ensuring compliance of locally used ETPL providers.

The WDB will designate a Local ETPL Coordinator responsible for carrying out responsibilities related to the administration of the ETPL and for providing technical assistance to training providers regarding ETPL requirements.

The WDB has authority to supplement criteria and information required by the State for programs used within the local area to support informed consumer choice and the achievement of local performance indicators, with the exception of Registered Apprenticeship programs. Supplemental criteria and information may include information on programs of training services linked to occupations in demand, performance and cost information, information that shows how programs are responsive to local requirements,

and other appropriate information. Any supplemental criteria and information required at the local level will be outlined in procedures and posted on the WDB website (<http://solanoemployment.org>).

## ETPL TRAINING ELIGIBILITY

### Training Providers

To be an eligible training provider on the ETPL, an entity must qualify as one of the following:

1. An institution of higher education that provides a program leading to a recognized post-secondary credential;
2. An entity that carries out programs registered under the National Apprenticeship Act. Registered Apprenticeship Programs registered with the U.S. Department of Labor Office of Apprenticeship or a recognized State Apprenticeship Agency are automatically eligible for inclusion on the ETPL. These programs are not subject to the same initial eligibility application requirements as other training providers; however, the program sponsor must consent to be listed on the ETPL; or
3. A public or private provider of a program of training services, which may include joint labor-management organizations, community-based organizations, and eligible providers of adult education and literacy activities under WIOA Title II, if such activities are provided in combination with occupational skills training.

Training providers must be a legal entity registered to do business in California and offer training programs that prepare participants for employment opportunities. Training providers must also meet California operating requirements applicable to the type of institution, including accreditation requirements for institutions of higher education or approval to operate by the California Bureau for Private Postsecondary Education (BPPE), when applicable. Training providers must also be able to show compliance with the requirements at time of new provider registration:

1. Have the ability to:
  - a. Offer programs that lead to recognized postsecondary credentials;
  - b. Meet the needs of local employers and participants; and
  - c. Serve individuals with barriers to employment.
2. Have refund policies specifying when refunds for tuition and other costs associated with the training program will be allowed. Refund policies must be written and published so students are aware of how to request a refund;

3. Have a grievance policy which provides for due process for students to file complaints with an organization against faculty, staff, or other employees. Grievance policies must be written and published so that students are aware of how to file a complaint;
4. Be financially stable;
5. Can maintain WIOA training participant records and make those records available for monitoring or auditing purposes;
6. Can comply with non-discrimination and equal opportunity provisions of the following laws:
  - Regulations under Section 188 of the Workforce Innovation and Opportunity Act
  - 29 CFR 37, Title VI of the Civil Rights Act of 1964;
  - Age Discrimination Act of 1998;
  - Sections 504 and 508 of the Rehabilitation Act of 1973;
  - Title IX of the Education Amendments of 1972;
  - Title II Subpart A of the American with Disabilities Act of 1990; and
  - The Genetic Information Nondiscrimination Act of 2008.

Training providers must post Equal Employment Opportunity and Non-Discrimination procedures at their facilities.

7. Not be currently debarred by the state or federal government.
8. Provide required performance and program information for each approved training program in accordance with state reporting requirements for the ETPL.

The WDB must ensure that there are no conflicts of interest between the WDB and the training provider, including a prohibition on payment of referral fees by training providers to WDB or America's Job Centers of California (AJCC) staff.

### **Training Programs**

Eligible training on the ETPL is defined as one or more courses or classes, or a structured regimen that leads to:

Training programs should demonstrate alignment with in-demand industry sectors or occupations based on labor market information.

1. An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state or the federal government, an associate or baccalaureate degree;

2. A secondary school diploma or its equivalent if provided concurrently or in combination with occupational skills training;
3. Employment; or
4. Measurable skill gains toward a credential.

Examples of training services required to be on the ETPL include:

1. Occupational skills training, including training for nontraditional employment;
2. Skills upgrading and retraining;
3. Entrepreneurial training;
4. Job readiness training provided in combination with services listed in this section;
5. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with training services listed in this section;

Examples of training services that do not require inclusion on the Eligible Training Provider List include:

1. Short-term pre-vocational training;
2. Workforce preparation training, as defined by 20 CFR 678.430 (b.08);
3. Avocational training (for fun, recreation, or non-job-related);
4. Subscription or membership fee based self-paced training; and
5. Training that consists only of materials purchased for a fee and is self-paced.

## ETPL APPLICATION PROCESS

### **New Training Providers**

All providers that have not previously been eligible to provide training services under WIOA Sec. 122, except for registered apprenticeship programs, must submit required information to be considered for initial eligibility. The requirements to become an eligible provider of training services apply to all organizations providing WIOA Title I training to adults and dislocated workers. Registered Apprenticeship programs registered with the U.S. Department of Labor Office of Apprenticeship or a recognized State Apprenticeship

Agency are automatically eligible for inclusion on the ETPL upon request and will remain on the list as long as the program remains registered.

Private post-secondary training providers are required to meet the Bureau of Private Postsecondary Education (BPPE) standards to become and remain eligible under the Directory of Approved Institutions. For additional information about the BPPE requirements, log on to: <https://www.bppe.ca.gov/>. Private post-secondary training providers must submit an “Approval to Operate” from the BPPE as part of their initial application process.

Training providers seeking eligibility must submit their provider and training program applications through the CalJOBS ETPL module. Upon registration, the WDB ETPL Coordinator will review and give the training provider access to enter course information for their respective training programs.

### **Training Programs**

An initial eligibility determination will be conducted for each training provider on a program by program basis; there is no blanket approval for all programs offered by a provider. Training providers applying to have their programs be considered eligible must provide the following information for each training program:

1. A description of the training program;
2. Program cost information, including tuition and fees;
3. Evidence of state licensure requirements of training providers, and licensing status of providers of training services, as applicable;
4. Labor market information identifying the occupation or employment opportunities for which the training program prepares participants;
5. Information on whether the training provider has partnerships with business and connects the training program to employment opportunities. The information may include whether the training program is offered or was designed as a result of the partnership, or may include a list of employers that have committed to hire graduates from the training program;
6. Information regarding how successful completion of the program results in or leads to a federally or locally recognized credential;
7. Description of the accessibility of training services (i.e., is this program of study a facility-based training, or is it accessible throughout the state, to individuals in rural areas, through the use of technology);

8. Description of the program's demonstrated effectiveness in serving employed individuals and individuals with barriers to employment; and
9. Performance information required for the ETPL, as defined by state reporting requirements.

The WIOA Training Provider Application (which can be found on the WDB's website) is designed to capture all relevant information about the provider and training program. The ETPL Coordinator listed on the website will provide assistance and guidance to training providers on the application process. The ETPL Coordinator will maintain documentation related to provider and program eligibility determinations in accordance with applicable record retention requirements.

Training providers must submit ETPL applications in accordance with the state assignment process. The Local Board where the training provider's headquarters is located is responsible for reviewing and nominating the provider's profile. If the training provider's headquarters is located out of state, the Local Board where the training program is physically located must review and nominate the provider's profile. The Local Board where the training program is physically located must conduct the eligibility review for the program(s), including programs delivered online, and ensure the application is complete and the program meets state eligibility requirements prior to approving the application for state review. Local Boards are not responsible for eligibility determinations for Registered Apprenticeship Programs (RAPs) or out-of-state training providers.

#### **MAINTAINING ETPL STATUS**

All training providers on the ETPL will be evaluated to ensure they continue to meet eligibility to be retained on the ETPL. Initial eligibility for a program expires within one year of approval, and the first continued eligibility review must occur within one year to avoid a lapse in approval. Continued eligibility may be granted for up to two years in accordance with state ETPL requirements. To determine continued eligibility, the WDB ETPL Coordinator and the State will verify that the training provider continues to meet state eligibility requirements for inclusion on the ETPL. The performance calculations for each program are based on WIOA-funded participants only and is verified using the federal ETP report published by the state. Training providers must submit required performance information in accordance with state reporting requirements for the ETPL.

The WDB will conduct oversight and monitoring of locally utilized Eligible Training Providers to ensure compliance with applicable federal and state requirements. Monitoring activities will be conducted in accordance with established procedures.

#### **DENIALS AND REMOVALS FROM THE ETPL**

A training provider or training program may be denied initial or continued eligibility or removed from the ETPL by the State or the WDB for the following reasons:

1. The application is not complete, or information was not provided in a timely manner;

2. The training program does not meet the definition of training services as defined in this policy;
3. Required performance information is not provided or does not meet applicable state reporting requirements;
4. The training provider is not in compliance with WIOA regulations, or any agreement executed under WIOA;
5. The training program does not meet the eligibility requirements as outlined in this policy; or
6. It is determined that the training provider intentionally supplied inaccurate information.

Providers determined to have intentionally supplied inaccurate information or to have substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38, will be removed from the state list of eligible training providers and programs for not less than 2 years and is liable to repay all youth, adult, and dislocated worker training funds it received during the period of noncompliance. When a program of training is removed from the state ETPL, WIOA participants currently enrolled in the program with the support of an ITA may complete their training unless the provider or program has lost state licensure, certification, or authorization to operate by the appropriate state oversight agency.

The WDB may temporarily suspend a training provider or training program from the ETPL while concerns regarding compliance, accuracy of information, or other eligibility requirements are reviewed. During a period of suspension, the provider or program may not receive new WIOA-funded participants until the issue has been resolved.

If the WDB denies a training provider or training program for inclusion on the ETPL, or removes a training provider or training program from the ETPL, the ETPL Coordinator will inform the training provider in writing within 30 days of the application and include the reason(s) for the denial, as well as provide information on the local appeal process. If the State denies a training provider's listing, they will notify the WDB within 30 days of receipt of the nomination, who in turn will notify the training provider within 30 days of notification from the State.

If a training provider becomes unable to continue delivering training services due to closure, loss of licensure, or other operational failure, the WDB will work with affected participants to identify comparable training opportunities with other ETPL providers and ensure continuity of services to the extent possible.

## **Requests for Appeal**

Training providers may file appeals with the WDB regarding the denial of a provider's application for initial or continued eligibility, the suspension of eligibility, or the removal of a provider or program from the ETPL.

All appeals must be submitted in writing within 30 calendar days from the date of the rejection notice or notice of suspension of eligibility. The request for an appeal hearing must include:

- A statement of the desire to appeal;
- The name, address, and telephone number of the training provider;
- A description of the adverse action; and
- Detailed explanation of the reasons claimed that the denial or removal was erroneous.

Such appeals must be addressed to:

Workforce Development Board of Solano County  
c/o ETPL Coordinator  
500 Chadbourne Rd, Suite A  
Fairfield, CA 94534

An appeals resolution will be scheduled within 60 days of the date the appeal request was received.

## **REFERENCES**

### **Law**

- Workforce Innovation and Opportunity Act of 2014 (WIOA), Public Law (Pub. L.) 113- 128, enacted July 22, 2014

### **Federal Guidance**

- Training and Employment Guidance Letter (TEGL) 41-14 – [WIOA Title I Training Provider Eligibility](#) and TEGL 41-14, [Change 1](#)
- WIOA Title I Sections 116, 122, and 134(c)(3)(G)
- 20 CFR Part 680 Subpart D – Eligible Training Providers (§680.400-680.530)
- 20 CFR §680.340 Consumer Choice Requirements

### **State Guidance**

- Workforce Services Directive (WSD) 25-02 – Eligible Training Provider List

### **Approved by**

Workforce Development Board of Solano County



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
ELIGIBLE TRAINING PROVIDER LIST (ETPL) POLICY  
(Issued March 20, 2026)

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The Workforce Development Board (WDB) of Solano County's Eligible Training Provider List (ETPL) Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Eligible Training Provider List (ETPL) Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **ETPL Policy Revision Summary – Policy 2026-04**

### **Section 2 – Questions**

**Change:** Updated the policy contact information.

**Reason:** Reflect current ETPL Coordinator as contract.

### **Section 3 – Policy**

**Change:** Added language reinforcing informed consumer choice when selecting training programs from providers listed on the ETPL.

**Reason:** Aligns the policy with federal requirements emphasizing participant choice in training services (WIOA Section 134(c)(3)(G); 20 CFR 680.340).

### **Section 4 – State vs. Local Responsibility**

**Change:** Clarified State’s responsibility for maintaining the CA ETPL and establishing eligibility criteria.

**Reason:** Aligns the policy with WIOA and federal regulations establishing the State’s role in administering the ETPL (WIOA Section 122(a); 20 CFR 680.400–680.430).

**Change:** Added designation of a Local ETPL Coordinator responsible for administering ETPL activities locally.

**Reason:** Establishes clear local administrative responsibility for ETPL management consistent with Local Board oversight responsibilities (20 CFR 679.370; WSD 25-02).

**Change:** Clarified that the WDB may supplement state-required information with additional local criteria to support informed consumer choice and local performance goals.

**Reason:** WIOA permits Local Workforce Development Boards to supplement state ETPL information to support consumer choice (WIOA Section 122(b)(1); 20 CFR 680.410).

### **Section 5 – ETPL Training Eligibility**

**Change:** Added language clarifying automatic eligibility for Registered Apprenticeship Programs.

**Reason:** WIOA requires Registered Apprenticeship Programs to be automatically eligible for inclusion on the ETPL upon request (WIOA Section 122(a)(3); 20 CFR 680.470).

**Change:** Added requirement that training providers meet applicable California operating requirements, including CA Bureau for Private Postsecondary Education (BPPE) approval when applicable.

**Reason:** Ensures providers receiving WIOA funds are legally authorized to operate and provide training services (20 CFR 680.410(d)).

**Change:** Added requirement that training providers provide performance and program information required for ETPL reporting.

**Reason:** Training providers must submit data used for the Eligible Training Provider performance report (WIOA Section 116(d)(4); 20 CFR 680.460).

**Change:** Added language stating that training programs “should” demonstrate alignment with employment opportunities based on labor market information.

**Reason:** Supports workforce system goals of aligning training investments with in-demand industry sectors or occupations (WIOA Section 134(c)(3)(A); 20 CFR 680.420).

### **Section 6 – ETPL Application Process**

**Change:** Updated Registered Apprenticeship language to clarify automatic ETPL eligibility upon request.

**Reason:** Aligns the policy with WIOA and federal regulations regarding apprenticeship eligibility (WIOA Section 122(a)(3); 20 CFR 680.470).

**Change:** Clarified that training providers must submit applications through the CalJOBS ETPL module.  
**Reason:** CalJOBS is the State’s designated system for ETPL applications and reporting (WSD 25-02).

**Change:** Replaced a restrictive high-demand occupation definition with language referencing labor market information.

**Reason:** Removes unnecessary restrictions while maintaining labor market alignment requirements (20 CFR 680.420).

**Change:** Replaced a detailed list of performance metrics with language referencing state ETPL reporting requirements.

**Reason:** State reporting requirements may change; referencing them prevents the policy from becoming outdated (WIOA Section 116(d)(4); 20 CFR 680.460).

**Change:** Clarified that the ETPL Coordinator maintains eligibility documentation according to record retention requirements.

**Reason:** Ensures documentation responsibilities are clear without embedding operational procedures in policy (2 CFR 200.334; WIOA Section 185).

**Change:** Added language clarifying the state ETPL assignment process and defining Local Board responsibilities for reviewing and nominating provider profiles and conducting eligibility reviews for training programs.

**Reason:** Aligns with the roles and responsibilities outlined in WSD 25-02 and federal ETPL regulations (20 CFR 680.410; 20 CFR 680.430).

### **Section 7 – Maintaining ETPL Status**

**Change:** Added language clarifying the timeline for maintaining ETPL eligibility for both initial and continued eligibility.

**Reason:** Aligns with state ETPL eligibility review requirements (20 CFR 680.460; WSD 25-02).

**Change:** Removed language requiring providers to meet specific negotiated WIOA performance thresholds.

**Reason:** Performance thresholds are managed through the state ETPL reporting system rather than local policy (WIOA Section 116(d)(4); 20 CFR 680.460).

**Change:** Added language requiring providers to submit performance information required for the ETPL.

**Reason:** Ensures ongoing compliance with state reporting requirements (WIOA Section 116(d)(4); 20 CFR 680.460).

**Change:** Simplified monitoring language to reference oversight conducted according to established procedures.

**Reason:** Operational monitoring processes are maintained in internal procedures rather than policy.

### **Section 8 – Denials and Removals from the ETPL**

**Change:** Clarified that both training providers and training programs may be denied eligibility or removed from the ETPL.

**Reason:** Federal regulations allow removal of either providers or individual training programs (20 CFR 680.480).

**Change:** Updated performance violation language to reference state reporting requirements rather than specific thresholds.

**Reason:** Avoids tying the policy to performance metrics that may change (WIOA Section 116(d)(4); 20 CFR 680.460).

**Change:** Added authority for the WDB to temporarily suspend providers while compliance issues are reviewed.

**Reason:** Provides flexibility to address compliance concerns prior to removal actions (20 CFR 680.480; WSD 25-02).

**Change:** Expanded appeal rights to include suspension decisions.

**Reason:** Ensures due process protections for training providers affected by enforcement actions (20 CFR 683.630).

**Change:** Added language stating that if a training provider becomes unable to continue delivering training services (e.g., closure, loss of licensure, or operational failure), the Workforce Development Board (WDB) will work with affected participants to identify comparable training opportunities with other Eligible Training Provider List (ETPL) providers and ensure continuity of services to the extent possible.

**Reason:** During the ETPL monitoring review, staff noted that the monitoring tool identified the following item as not addressed in the policy or procedures: “Do the P&Ps include a plan for providing comparable training opportunities if a training provider goes out of business?” Although the policy addressed provider removal from the ETPL, the monitoring review indicated that language specifically addressing continuity of participant training in the event a provider ceases operations was not explicitly included. This language was added to clarify the WDB’s responsibility to protect participants and support continuation of training services when feasible.

## **Section 9 – References**

**Change:** Updated federal statutory and regulatory references to include WIOA Sections 116, 122, and 134(c)(3)(G) and 20 CFR Part 680 Subpart D – Eligible Training Providers and Consumer Choice (§680.400–§680.530) and added 20 CFR §680.340 – Consumer Choice Requirements.

**Reason:** Ensures the policy references the correct federal statutory and regulatory framework governing ETPL eligibility, performance reporting, and participant choice in training services.

**Change:** Replaced outdated state guidance with Workforce Services Directive (WSD) 25-02 – Eligible Training Provider List.

**Reason:** WSD 25-02 is the current directive governing ETPL policy and procedures.



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM X.B**

**March 20, 2026**

<p><b>SUBJECT</b> Review and Approval of the WIOA Adult and Dislocated Worker Training Contract Policy (2026-05)</p>	<p><b>ATTACHMENTS</b> A, B, C</p>
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**RECOMMENDATION**

Staff recommend the review and approve WDB Policy 2026-05 WIOA Adult and Dislocated Worker Training Contact Policy, as revised.

Attachment A – redlined version of policy 2018-03

Attachment B – clean version of revised policy 2026-05

Attachment C – summary of changes

**DISCUSSION**

To ensure continued compliance with the WIOA and related programmatic requirements, the WDB periodically reviews and updates its policies as needed. As part of this process, staff conducted a review of the Adult and Dislocated Worker Training Contract Policy to ensure alignment with current federal regulations, state guidance, and local administrative practices.

The review identified several areas where updates were necessary to reflect current training costs, clarify allowable training delivery methods under WIOA, and incorporate provisions previously issued through policy changes into the main policy document. Revisions were also made to update references to current state directives and federal regulations governing training services.

**OVERVIEW**

This policy establishes the parameters for providing training services under the WIOA Adult and Dislocated Worker programs, including the use of Individual Training Accounts (ITAs), allowable exceptions for contract-based training, and requirements for training provider accountability. The workforce development system emphasizes participant choice, alignment with labor market demand, and responsible stewardship of training funds.

The policy was updated to reflect current training costs by increasing the maximum ITA amount to better support participant access to occupational training programs. Updates were also made to reflect the current administrative structure of the WDB by revising approval authority language.

Additional updates clarify the circumstances under which training services may be delivered through contracts rather than ITAs. These changes align the policy with federal regulations that allow contract-based training in specific situations, such as when there is an insufficient number of eligible training providers, when training is designed for cohorts of participants, or when it is determined to be the most appropriate training strategy. The policy also clarifies that training funded under these exceptions is intended to support employment in in-demand industries or occupations identified through labor market information. To improve flexibility and ensure the policy remains current, language was also modernized

to reference applicable federal regulations and directives rather than prescriptive operational requirements.

The revisions also incorporate requirements related to training provider refund policies and the recovery of unused training funds. These provisions were previously issued through a policy change and are now consolidated into the primary policy document to ensure all training requirements are maintained within a single governing policy.

Finally, the policy references were updated to include the applicable federal regulation governing Adult and Dislocated Worker training activities and to replace outdated state guidance with the current Workforce Services Directive governing the ETPL. These updates ensure the policy reflects the current regulatory framework for WIOA training services.

Overall, the revisions strengthen the policy by aligning it with current regulatory guidance, improving clarity around training delivery options, and ensuring that training investments continue to support participant success and local workforce needs.

**REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Dave Hubble at 707-863-3501 if you have any questions regarding the information outlined in this report.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: ~~May 18, 2018~~ March 20, 2026  
Number: ~~2018-03~~ 2026-05

### WIOA ADULT AND DISLOCATED WORKER TRAINING CONTRACTS POLICY

#### INTRODUCTION

This policy provides guidance regarding the requirements for establishing training contracts for enrolled Workforce Innovation and Opportunity Act (WIOA) clients under the Adult and Dislocated Worker grants. It is the policy of the Workforce Development Board of Solano County (WDBSC) to provide enrolled WIOA clients the opportunity to participate in vocational training via training contracts. Individualized Training Accounts (ITAs) for training services listed on the California-approved Eligible Training Providers List (ETPL) are the primary method to be used for procuring training services under WIOA.

WIOA stipulates that the selection of training services should be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, informed by the performance of relevant training providers, and coordinated to the extent possible with other sources of assistance. Further, training services ~~must be linked~~ should demonstrate alignment with to in-demand employment opportunities in the local area or in a geographic area in which the ~~adult or dislocated worker participant~~ participant is willing to commute or relocate, based on available labor market information.

The ETPL list of approved training providers and programs ensure the accountability, quality and labor-market relevance of training services that receive funds through WIOA Title I, Subtitle B. California's ETPL is available online at: [www.caljobs.ca.gov](http://www.caljobs.ca.gov). This list is to ensure that individuals participate and are fully informed of vocational options available, as well as promote customer choice in the process. The participatory process also allows individuals to select training programs that offers opportunities for employment in in-demand occupations.

#### QUESTIONS

Questions relating to this policy should be directed to ~~Marion Aiken, Workforce Services Manager, at [maiken@solanowdb.org](mailto:maiken@solanowdb.org) or at (707) 863-3594~~ Dave Hubble, Executive Director at [dhubble@solanowdb.org](mailto:dhubble@solanowdb.org) at (707) 863-3501.

#### RECISSIONS

This policy replaces and cancels the 2018-03 WIOA Adult and Dislocated Worker Training Contract Policy, and 2018-03 WIOA Adult and Dislocated Worker Training Contract Policy, Change 1.

## ATTACHMENTS

- Attachment A: Definition of Key Terms
- Attachment B: Staff Acknowledgement

## POLICY

Training services can be critical to the employment success of many adult and dislocated workers. There is no sequence of service requirement for “career services” and training. This means that staff may determine training is appropriate regardless of whether the individual has received basic or individualized career services first. Under WIOA, training services may be provided if the appropriate WDB staff determine, after an interview, evaluation or assessment, and career planning, that the individual could benefit from training to reach their employment goals. More specifically, staff may issue an ITA to fund training for Adults and Dislocated Workers if the following conditions are met. The client must:

- Be unlikely or unable through career services alone to obtain or retain employment that leads to economic self-sufficiency or wages comparable to/higher than wages from previous employment;
- Be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to/higher than wages from previous employment;
- Have the skills and qualifications to successfully participate in the selected program of training services;
- Be determined eligible in accordance with the State and local priority system in effect for Adults under WIOA sec. 134(c)(3)(E) if training services are provided through the adult funding stream;
- Select a program of training services that is directly linked to the employment opportunities in the local area (Solano County) or the planning region (North Bay), or in another area to which the individual is willing to commute or relocate; and
- Not have received WIOA-funded ITA training within 24 months of either their last date of participation or completion of a prior WIOA funded training program through the WDB, whichever date is most recent.

In addition, for training contracts to be approved and awarded to WDB WIOA clients; the client must be unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, Trade Adjustment Assistance (TAA), or Federal Pell Grants established under title IV of the Higher Education Act of 1965, or be in need of WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants.

In making the funding determination, WDB staff should take into account the full cost of participating in training services, including the cost of support services and other appropriate costs. The WDB reserves the right to prohibit the referral of customers to schools that have poor performance records in serving our clients.

## TRAINING PARAMETERS

The training must result in an industry-recognized certificate or the attainment of skills or a generally accepted standard. In order for a provider of training services to receive WIOA funds, its program(s) may provide training services, such as:

- Occupational skills training, including training for non-traditional employment and occupational skills training that integrated English-language and math instruction needed to succeed on the job;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training; and
- Apprenticeship and pre-apprenticeship skills training.

The amount of training tuition must not exceed ~~\$7500.00~~ 10,000 without justification and management approval. The duration of training must not exceed 12-months in duration.

Internal procedures must outline how assessment for training is provided, the process of issuing an ITA, what costs an ITA will cover, how payments are made, and outcome considerations. In addition, internal procedures must define how WDB staff will record the participant training-related financial assistance needs, the methodology of how the needs were determined, and the mix of funding assistance in the participant's record.

## COORDINATING ITAs WITH OTHER SOURCES OF FUNDING

WIOA funding for training is limited to participants who are either unable to obtain grant assistance from other sources to pay the costs of their training, or require assistance beyond that available under grant assistance from other sources to pay the costs of such training. WDB staff must consider the availability of other sources of grants to pay for training costs so that WIOA funds are used to supplement other funding sources.

A WIOA participant may enroll in WIOA-funded training while an application for a Pell Grant is pending as long as the WDB has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant if it is later awarded. If a Pell Grant is later awarded, the training provider must reimburse the WDB the WIOA funds used to begin training. Reimbursement is not required from the portion of Pell Grant assistance to the WIOA participant for education-related expenses, but does include any education fees charged to attend training.

A WIOA participant may also enroll in WIOA-funded training if he/she is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination. If the petition is certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA.

ITAs may be provided to individuals in conjunction with On-the-Job Training (OJT) funds when appropriate, and the ITA may be used before, during, or after an OJT.

Registered apprenticeships automatically qualify to be on a state's ETPL, but may not always be listed on the ETPL because apprenticeship programs may choose whether to be included. ITAs can be used for the following apprenticeship-related costs:

- Tuition, books, and related for pre-apprenticeship training;
- Tuition, books and related for classroom training that is part of the apprenticeship; and
- Supportive services.

Additional opportunities for co-enrollment of participants in other local or regional programs and exploration of shared costs across programs should be considered as applicable.

### EXCEPTIONS TO THE ITA AND THE ETPL REQUIREMENTS

While ITAs are the preferred method of training delivery, a contract for training services may be developed instead of an ITA (or in combination with an ITA) in certain circumstances as allowed under the DOL Final Rule.

The contract exceptions to an ITA are:

1. On-the-job training (which may include placing participants in a Registered Apprenticeship program), customized training, incumbent worker training, or internships, paid or unpaid work experience, and transitional jobs are not included on the ETPL and therefore not subject to ITA eligibility requirements. Separate policies outline the requirements of these training types;
2. If the WDB determines that there are an insufficient number of eligible providers of training services to use ITAs. In this exception, training ~~must~~ should be provided lead to employment in in-demand occupations or industries as determined by the WDB identified through labor market information;
3. If an exception is necessary to meet the needs of individuals with barriers to employment;
4. If the WDB determines that the most appropriate training could be provided by an institution of higher education to train multiple individuals for jobs employment opportunities in in-demand sectors or occupations. In this exception, the ~~training provider must still be on the ETPL~~ WDB may enter into a contract with the institution of higher education to provide training services instead of using ITAs. When training services are provided through this exception, the institution is not required to be listed on the ETPL; and
5. If the WDB determines a pay-for-performance contract is the most effective means of providing training services (up to 10% of local funds). Institutions of higher education, such as community colleges, do not need to be on the state's ETPL to provide training through direct contract with the WDB under this exception.

Details and process for these exceptions must be outlined in procedures.

Additionally, the WDB may determine that providing training through a combination of ITAs and contracts is the most effective approach. This approach could be used to

support placing participants in programs such as Registered Apprenticeships and other similar types of training.

## DOCUMENTATION

The individual's case file must document that the WIOA approved program on the ETPL at the time that training is approved, or document the exception to the ITA rule. The individual case file must also contain a copy of an ITA commitment or agreement document and supporting training source documentation that identifies at a minimum the training cost, the provider and program, and start and end dates for the training.

## **TRAINING PROVIDER REFUND REQUIREMENTS**

All participants who are enrolled in training must be covered by the training institution's tuition refund policy. In the absence of a refund policy established by the training institution, the WDB staff, subrecipient or contractors must negotiate a reasonable refund policy with the training site.

Prior to participants entering training, staff must review the training provider's refund policy on early termination, including the following:

- Percentage of the advanced payment to be returned upon non-completion of courses.
- Turnaround time of refund.
- Time spent in training before a refund will no longer be honored and maintain, at minimum, monthly tracking to determine the participant is still receiving training and to ensure prompt return of any unused training funds.
- Requirement for the training provider to immediately notify the WDB Solano staff, subrecipient, or contractor if a WIOA participant drops out of a training program during the period when tuition can be refunded.

It is recommended to have refund agreements in the form of a contract with the training provider to ensure prompt return of any unused WIOA funds for the early dropout of a participant. The Eligible Training Provider List (ETPL) Coordinator should obtain the designated training provider's standard policy regarding the amount of tuition that must be paid in advance to enroll or accept a participant, as well as any early termination policies, at time of ETPL renewal.

Staff should track participants on a monthly basis to determine if the participant is still receiving training services. If the participant leaves the program before completion, staff must work with the training provider to ensure prompt return of any unused training monies. Fiscal staff will review the collection process of any outstanding training and/or tuition refunds.

Failure to recover tuition and training refund costs will result in an audit finding and disallowed costs.

## DISCLAIMER

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor,

and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

## REFERENCES

### Law

- [Workforce Innovation and Opportunity Act of 2014 \(WIOA\)](#)
- [AB-1270 California Workforce Innovation and Opportunity Act](#)
- Senate Bill 734

### Federal Guidance

- [Department of Labor Final Rule](#)
- [20 CFR Part 680 – Adult and Dislocated Worker Activities](#)
- Training and Employment Guidance Letter (TEGL) 03-15 – [Guidance on Services Provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act and Wagner Peyser, as Amended by WIOA, and Guidance for the Transition to WIOA Services](#)
- [Title 2 CFR Part 2900, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
- [20 CFR 680.300–680.340 – Individual Training Accounts](#)
- [20 CFR 680.320 – Exceptions to ITA Requirements](#)
- [20 CFR 680.420 – Program of Training Services](#)
- [2 CFR Part 2900 – Department of Labor Exceptions](#)

### State Guidance

- [Workforce Services Directive \(WSD\) 15-07 – WIOA Eligible Training Provider List – Policy and Procedures 25-02 – California Eligible Training Provider List](#)
- [WSD 14-1 – WIA Training Expenditure Requirements](#)
- [WSD 08-10 – Final Rule on Priority of Service for Veterans and Eligible Spouses](#)
- [WSD19-10 – Recovery of WIOA Tuition and Training Refunds](#)
- [WSD24-15 – Priority of Service for Veterans and Eligible Spouses](#)

### Approved by

Workforce Development Board of Solano County

## Definition of Key Terms

**Informed Customer Choice** as defined by WSD ~~15-07~~ 25-02 is to ensure job seeking customers may have an “informed customer choice” and are prepared with the skills needed to fill hiring opportunities in in-demand sectors and career pathways in high wage occupations, AJCC staff will provide access to skills assessment tools, career planning resources, updated labor market information identifying industry sectors and occupational clusters that are high-growth, high-demand, projecting skills shortages, and/or vital to the regional economy, and access to the eligible list of training providers (ETPL~~—~~) provided in electronic format through the ~~CALJobs~~ CalJOBS system which provides relevant information on available training programs, including performance and cost.

**In-Demand** as defined by WSD ~~15-07~~ 25-02 refers to occupations, industry sectors or clusters, or career pathways that have been identified in the state, regional, and/or local Workforce Development Plan as emerging, growing, a priority for local workforce partners, or otherwise having the best job prospects due to the workforce needs or hiring demands of employers.

### Training Providers

**Pre-Apprenticeship Skills Training** as defined in 20 CFR 681.480 and WSD ~~15-07~~ 25-02 is a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership (letter of commitment) with at least one, if not more, approved apprenticeship programs. In California, the apprenticeship partner must be approved by the California Department of Industrial Relations, Division of Apprenticeship Standards (DIR/DAS). Such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a registered apprenticeship program.

**Program of Training Services** as defined by 20 CFR Section 680;~~0~~420 is one or more courses or classes, or a structured regimen that leads to one of the following:

- a. A recognized post-secondary credential, secondary school diploma or its equivalent,
- b. Employment,
- c. Or measurable skill gains toward such a credential or employment.



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:

ADULT AND DISLOCATED WORKER TRAINING CONTRACT POLICY

(Issued March 20, 2026)

---

The Workforce Development Board (WDB) of Solano County's Adult and Dislocated Worker Training Contract Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Adult and Dislocated Worker Training Contract Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: March 20, 2026    Number: 2026-05

### WIOA ADULT AND DISLOCATED WORKER TRAINING CONTRACTS POLICY

#### INTRODUCTION

This policy provides guidance regarding the requirements for establishing training contracts for enrolled Workforce Innovation and Opportunity Act (WIOA) clients under the Adult and Dislocated Worker grants. It is the policy of the Workforce Development Board of Solano County (WDBSC) to provide enrolled WIOA clients the opportunity to participate in vocational training via training contracts. Individualized Training Accounts (ITAs) for training services listed on the California-approved Eligible Training Providers List (ETPL) are the primary method to be used for procuring training services under WIOA.

WIOA stipulates that the selection of training services should be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, informed by the performance of relevant training providers, and coordinated to the extent possible with other sources of assistance. Further, training services should demonstrate alignment with employment opportunities in the local area or in a geographic area in which the participant is willing to commute or relocate, based on available labor market information.

The ETPL list of approved training providers and programs ensure the accountability, quality and labor-market relevance of training services that receive funds through WIOA Title I, Subtitle B. California's ETPL is available online at: [www.caljobs.ca.gov](http://www.caljobs.ca.gov). This list is to ensure that individuals participate and are fully informed of vocational options available, as well as promote customer choice in the process. The participatory process also allows individuals to select training programs that offers opportunities for employment in in-demand occupations.

#### QUESTIONS

Questions relating to this policy should be directed to Dave Hubble, Executive Director at [dhubble@solanowdb.org](mailto:dhubble@solanowdb.org) at (707) 863-3501.

#### RECISSIONS

This policy replaces and cancels the 2018-03 WIOA Adult and Dislocated Worker Training Contract Policy, and 2018-03 WIOA Adult and Dislocated Worker Training Contract Policy, Change 1.

#### ATTACHMENTS

- Attachment A: Definition of Key Terms
- Attachment B: Staff Acknowledgement

## POLICY

Training services can be critical to the employment success of many adult and dislocated workers. There is no sequence of service requirement for “career services” and training. This means that staff may determine training is appropriate regardless of whether the individual has received basic or individualized career services first. Under WIOA, training services may be provided if the appropriate WDB staff determine, after an interview, evaluation or assessment, and career planning, that the individual could benefit from training to reach their employment goals. More specifically, staff may issue an ITA to fund training for Adults and Dislocated Workers if the following conditions are met. The client must:

- Be unlikely or unable through career services alone to obtain or retain employment that leads to economic self-sufficiency or wages comparable to/higher than wages from previous employment;
- Be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to/higher than wages from previous employment;
- Have the skills and qualifications to successfully participate in the selected program of training services;
- Be determined eligible in accordance with the State and local priority system in effect for Adults under WIOA sec. 134(c)(3)(E) if training services are provided through the adult funding stream;
- Select a program of training services that is directly linked to the employment opportunities in the local area (Solano County) or the planning region (North Bay), or in another area to which the individual is willing to commute or relocate; and
- Not have received WIOA-funded ITA training within 24 months of either their last date of participation or completion of a prior WIOA funded training program through the WDB, whichever date is most recent.

In addition, for training contracts to be approved and awarded to WDB WIOA clients; the client must be unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, Trade Adjustment Assistance (TAA), or Federal Pell Grants established under title IV of the Higher Education Act of 1965, or be in need of WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants.

In making the funding determination, WDB staff should take into account the full cost of participating in training services, including the cost of support services and other appropriate costs. The WDB reserves the right to prohibit the referral of customers to schools that have poor performance records in serving our clients.

## TRAINING PARAMETERS

The training must result in an industry-recognized certificate or the attainment of skills or a generally accepted standard. In order for a provider of training services to receive WIOA funds, its program(s) may provide training services, such as:

- Occupational skills training, including training for non-traditional employment and occupational skills training that integrated English-language and math instruction needed to succeed on the job;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training; and
- Apprenticeship and pre-apprenticeship skills training.

The amount of training tuition must not exceed \$ 10,000 without justification and management approval. The duration of training must not exceed 12-months in duration.

Internal procedures must outline how assessment for training is provided, the process of issuing an ITA, what costs an ITA will cover, how payments are made, and outcome considerations. In addition, internal procedures must define how WDB staff will record the participant training-related financial assistance needs, the methodology of how the needs were determined, and the mix of funding assistance in the participant's record.

#### COORDINATING ITAs WITH OTHER SOURCES OF FUNDING

WIOA funding for training is limited to participants who are either unable to obtain grant assistance from other sources to pay the costs of their training, or require assistance beyond that available under grant assistance from other sources to pay the costs of such training. WDB staff must consider the availability of other sources of grants to pay for training costs so that WIOA funds are used to supplement other funding sources.

A WIOA participant may enroll in WIOA-funded training while an application for a Pell Grant is pending as long as the WDB has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant if it is later awarded. If a Pell Grant is later awarded, the training provider must reimburse the WDB the WIOA funds used to begin training. Reimbursement is not required from the portion of Pell Grant assistance to the WIOA participant for education-related expenses, but does include any education fees charged to attend training.

A WIOA participant may also enroll in WIOA-funded training if he/she is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination. If the petition is certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA.

ITAs may be provided to individuals in conjunction with On-the-Job Training (OJT) funds when appropriate, and the ITA may be used before, during, or after an OJT.

Registered apprenticeships automatically qualify to be on a state's ETPL, but may not always be listed on the ETPL because apprenticeship programs may choose whether to be included. ITAs can be used for the following apprenticeship-related costs:

- Tuition, books, and related for pre-apprenticeship training;

- Tuition, books and related for classroom training that is part of the apprenticeship; and
- Supportive services.

Additional opportunities for co-enrollment of participants in other local or regional programs and exploration of shared costs across programs should be considered as applicable.

### EXCEPTIONS TO THE ITA AND THE ETPL REQUIREMENTS

While ITAs are the preferred method of training delivery, a contract for training services may be developed instead of an ITA (or in combination with an ITA) in certain circumstances as allowed under the DOL Final Rule.

The contract exceptions to an ITA are:

1. On-the-job training (which may include placing participants in a Registered Apprenticeship program), customized training, incumbent worker training, or internships, paid or unpaid work experience, and transitional jobs are not included on the ETPL and therefore not subject to ITA eligibility requirements. Separate policies outline the requirements of these training types;
2. If the WDB determines that there are an insufficient number of eligible providers of training services to use ITAs. In this exception, training should lead to employment in in-demand occupations or industries identified through labor market information;
3. If an exception is necessary to meet the needs of individuals with barriers to employment;
4. If the WDB determines that the most appropriate training could be provided by an institution of higher education to train multiple individuals for employment opportunities in in-demand sectors or occupations. In this exception, the WDB may enter into a contract with the institution of higher education to provide training services instead of using ITAs. When training services are provided through this exception, the institution is not required to be listed on the ETPL; and
5. If the WDB determines a pay-for-performance contract is the most effective means of providing training services (up to 10% of local funds). Institutions of higher education, such as community colleges, do not need to be on the state's ETPL to provide training through direct contract with the WDB under this exception.

Details and process for these exceptions must be outlined in procedures.

Additionally, the WDB may determine that providing training through a combination of ITAs and contracts is the most effective approach. This approach could be used to support placing participants in programs such as Registered Apprenticeships and other similar types of training.

### DOCUMENTATION

The individual's case file must document that the WIOA approved program on the ETPL at the time that training is approved, or document the exception to the ITA rule. The individual case file must also contain a copy of an ITA commitment or agreement

document and supporting training source documentation that identifies at a minimum the training cost, the provider and program, and start and end dates for the training.

### **TRAINING PROVIDER REFUND REQUIREMENTS**

All participants who are enrolled in training must be covered by the training institution's tuition refund policy. In the absence of a refund policy established by the training institution, the WDB staff, subrecipient or contractors must negotiate a reasonable refund policy with the training site.

Prior to participants entering training, staff must review the training provider's refund policy on early termination, including the following:

- Percentage of the advanced payment to be returned upon non-completion of courses.
- Turnaround time of refund.
- Time spent in training before a refund will no longer be honored and maintain, at minimum, monthly tracking to determine the participant is still receiving training and to ensure prompt return of any unused training funds.
- Requirement for the training provider to immediately notify the WDB Solano staff, subrecipient, or contractor if a WIOA participant drops out of a training program during the period when tuition can be refunded.

It is recommended to have refund agreements in the form of a contract with the training provider to ensure prompt return of any unused WIOA funds for the early dropout of a participant. The Eligible Training Provider List (ETPL) Coordinator should obtain the designated training provider's standard policy regarding the amount of tuition that must be paid in advance to enroll or accept a participant, as well as any early termination policies, at time of ETPL renewal.

Staff should track participants on a monthly basis to determine if the participant is still receiving training services. If the participant leaves the program before completion, staff must work with the training provider to ensure prompt return of any unused training monies. Fiscal staff will review the collection process of any outstanding training and/or tuition refunds.

Failure to recover tuition and training refund costs will result in an audit finding and disallowed costs.

### **DISCLAIMER**

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor, and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

### **REFERENCES**

#### **Law**

- [Workforce Innovation and Opportunity Act of 2014 \(WIOA\)](#)
- [AB-1270 California Workforce Innovation and Opportunity Act](#)

- Senate Bill 734

### **Federal Guidance**

- Department of Labor Final Rule
- 20 CFR Part 680 – Adult and Dislocated Worker Activities
- Training and Employment Guidance Letter (TEGL) 03-15 – [Guidance on Services Provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act and Wagner Peyser, as Amended by WIOA, and Guidance for the Transition to WIOA Services](#)
- Title 2 CFR Part 2900, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 20 CFR 680.300–680.340 – Individual Training Accounts
- 20 CFR 680.320 – Exceptions to ITA Requirements
- 20 CFR 680.420 – Program of Training Services
- 2 CFR Part 2900 – Department of Labor Exceptions

### **State Guidance**

- Workforce Services Directive (WSD)25-02 – California Eligible Training Provider List
- WSD19-10 – Recovery of WIOA Tuition and Training Refunds
- WSD24-15 – Priority of Service for Veterans and Eligible Spouses

### **Approved by**

Workforce Development Board of Solano County

## Definition of Key Terms

**Informed Customer Choice** as defined by WSD 25-02 is to ensure job seeking customers may have an “informed customer choice” and are prepared with the skills needed to fill hiring opportunities in in-demand sectors and career pathways in high wage occupations, AJCC staff will provide access to skills assessment tools, career planning resources, updated labor market information identifying industry sectors and occupational clusters that are high-growth, high-demand, projecting skills shortages, and/or vital to the regional economy, and access to the eligible list of training providers (ETPL) provided in electronic format through the CalJOBS system which provides relevant information on available training programs, including performance and cost.

**In-Demand** as defined by WSD 25-02 refers to occupations, industry sectors or clusters, or career pathways that have been identified in the state, regional, and/or local Workforce Development Plan as emerging, growing, a priority for local workforce partners, or otherwise having the best job prospects due to the workforce needs or hiring demands of employers.

### Training Providers

**Pre-Apprenticeship Skills Training** as defined in 20 CFR 681.480 and WSD 25-02 is a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership (letter of commitment) with at least one, if not more, approved apprenticeship programs. In California, the apprenticeship partner must be approved by the California Department of Industrial Relations, Division of Apprenticeship Standards (DIR/DAS). Such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a registered apprenticeship program.

**Program of Training Services** as defined by 20 CFR Section 6800420 is one or more courses or classes, or a structured regimen that leads to one of the following:

- a. A recognized post-secondary credential, secondary school diploma or its equivalent,
- b. Employment,
- c. Or measurable skill gains toward such a credential or employment.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
ADULT AND DISLOCATED WORKER TRAINING CONTRACT POLICY

(Issued March 20, 2026)

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The Workforce Development Board (WDB) of Solano County's Adult and Dislocated Worker Training Contract Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Adult and Dislocated Worker Training Contract Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Adult & Dislocated Worker Training Contract Policy Change Summary (2026-05)

### Section 1 – Introduction

**Change:** Updated language stating that training services *should* demonstrate alignment with in-demand employment opportunities in the local or regional labor market based on available labor market information.

**Reason:** Softens previously restrictive language while maintaining alignment with workforce demand and allowing staff flexibility to support participant training choices and evolving labor market conditions (WIOA Section 134(c)(3)(A); 20 CFR 680.420).

### Section 2 – Questions

**Change:** Updated contact information

**Reason:** Contact changed for questions regarding the policy

### Section 3 – Recissions

**Change:** Added Recission section to note that old policies have been rescinded

**Reason:** To ensure current policy is the reference

### Section 6 – Training Parameters

**Change:** Updated the maximum Individual Training Account (ITA) amount from \$7,500 to \$10,000.

**Reason:** Training costs have increased since the cap was established. Increasing the ITA cap allows participants greater access to occupational training programs and reflects increases in tuition and training costs (WIOA Section 134(c)(3)(G); 20 CFR 680.300–680.340).

**Change:** Updated approval authority references to replace Workforce Services Director and Senior Manager with Executive Director or designee.

**Reason:** Ensures the policy reflects the current administrative structure of the WDB.

### Section 8 – Exceptions to the ITA and ETPL Requirements

**Change:** Clarified language describing the circumstances under which training services may be provided through a contract rather than through ITAs.

**Reason:** Aligns the policy with federal regulations allowing training services to be delivered through contracts in specific circumstances when ITAs are not the most appropriate training delivery method (20 CFR 680.320).

**Change:** Clarified language stating that training funded under the insufficient provider exception should lead to employment in in-demand occupations or industries identified through labor market information.

**Reason:** Ensures that training investments remain aligned with labor market demand and workforce system priorities (WIOA Section 134(c)(3)(A); 20 CFR 680.320).

**Change:** Clarified language stating that the WDB may enter into a contract with an institution of higher education to train multiple individuals for employment in in-demand industry sectors or occupations.

**Reason:** WIOA allows training services to be delivered through contracts when cohort-based training is determined to be the most appropriate approach (20 CFR 680.320).

**Change:** Clarified that institutions of higher education providing training through a direct contract under this exception are not required to be listed on the Eligible Training Provider List (ETPL).

**Reason:** Federal regulations allow the use of contract training with institutions of higher education under certain exceptions when it is the most appropriate method for delivering training services (20 CFR 680.320).

### **Section 9 – Training Provider Refund Requirements**

**Change:** Added section outlining requirements related to training provider refund policies and recovery of unused training funds.

**Reason:** Incorporates provisions previously issued under Policy 2018-03 Change 1 and consolidates refund recovery requirements into the main policy document to ensure proper stewardship and recovery of WIOA training funds (WSD 19-10 – Recovery of WIOA Tuition and Training Refunds).

### **Section 11 – References**

**Change:** Updated the References section to remove outdated Workforce Services Directives, add current federal regulatory citations governing WIOA Adult and Dislocated Worker training services, incorporate applicable federal cost principles, and update federal guidance references.

**Reason:** Ensures the policy references the current federal statutory and regulatory framework governing Individual Training Accounts, allowable training services, and contract-based training under the Workforce Innovation and Opportunity Act, incorporates federal cost principles applicable to Department of Labor grant programs, and replaces outdated state directives with current applicable guidance (WIOA Section 134(c)(3); 20 CFR Part 680; 20 CFR 680.300–680.340; 20 CFR 680.320; 20 CFR 680.420; 2 CFR Part 200; 2 CFR Part 2900; TEGL 03-15; WSD 25-02; WSD 19-10; WSD 24-15).

### **Attachment A – Definition of Key Terms**

**Change:** Updated directive references within the Definitions section to replace Workforce Services Directive WSD15-07 with Workforce Services Directive WSD25-02 – California Eligible Training Provider List.

**Reason:** Ensures the policy references the most current state guidance governing the Eligible Training Provider List and informed customer choice requirements (WSD 25-02).



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM X.C**

**March 20, 2026**

<p><b>SUBJECT</b> Review and Approval of the Supportive Services and Incentives Policy (2026-06)</p>	<p><b>ATTACHMENTS</b> A, B, C</p>
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**RECOMMENDATION**

Staff recommend the review and approve WDB Policy 2026-06 Supportive Services and Incentives Policy, as revised.

Attachment A – redlined version of policy 2020-04

Attachment B – clean version of revised policy 2026-06

Attachment C – summary of changes

**DISCUSSION**

To ensure continued compliance with the Workforce Innovation and Opportunity Act (WIOA) and related programmatic requirements, the WDB periodically reviews and updates its policies as needed. As part of this process, staff conducted a review of the Supportive Services and Incentives Policy to ensure alignment with current federal regulations, state guidance, and local administrative practices.

The review identified several areas where updates were necessary to improve clarity, ensure consistency with federal guidance governing supportive services and Needs-Related Payments, and provide greater operational flexibility in the administration of supportive services. Revisions were also made to update regulatory citations and incorporate provisions previously issued through policy changes into the main policy document.

**OVERVIEW**

This policy establishes the parameters for providing supportive services and incentives to eligible participants under the WIOA Adult, Dislocated Worker, and Youth programs. Supportive services are intended to assist participants in overcoming barriers to employment and training by addressing needs that may otherwise prevent individuals from successfully participating in workforce programs.

Updates were made to clarify supportive service eligibility for WIOA Youth participants, confirming that supportive services may be provided both during program participation and during the follow-up period for up to 12 months after exit, consistent with federal regulations.

The policy was also revised to remove individual supportive service category caps from the policy and instead maintain those limits within internal program procedures. This change modernizes the policy language and allows supportive services to be administered with greater flexibility based on participant needs, funding availability, and changing economic conditions, while maintaining alignment with allowable supportive service categories under WIOA.

Additional updates address Needs-Related Payments by clarifying the applicable statutory authority and referencing the training services described in WIOA rather than listing individual training types. This

change ensures the policy remains aligned with federal law and avoids the risk of outdated or incomplete references to training activities.

The revisions also increase the overall supportive services limit to better reflect current financial realities and potential barriers participants may face when pursuing employment or training. The policy further clarifies that specific limits for individual supportive service categories will be maintained through internal procedures rather than within the policy itself. In addition, provisions previously issued through a policy change regarding the use of pre-paid cards for supportive services have been incorporated into the primary policy to consolidate requirements within a single governing document.

Additional updates remove out-of-state job search and relocation assistance as allowable supportive service costs to ensure compliance with federal cost principles. Finally, the references section was updated to reflect the full range of federal regulations and current federal and state guidance governing supportive services and WIOA program implementation.

Overall, these revisions strengthen the policy by aligning it with current regulatory guidance, improving clarity in the administration of supportive services, and providing the flexibility necessary to address participant barriers while maintaining compliance with federal and state requirements.

**REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Dave Hubble at 707-863-3501 if you have any questions regarding the information outlined in this report.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: ~~July 17, 2020~~ March 20, 2026  
Number: ~~2020-03~~ 2026-06

### SUPPORTIVE SERVICES AND INCENTIVES POLICY

#### INTRODUCTION

This policy provides guidance to the Workforce Development Board (WDB) of Solano County in providing supportive services that are necessary to enable Workforce Innovation and Opportunity (WIOA) eligible individuals enrolled in the Adult, Dislocated Worker and Youth programs. These services are provided to enrolled participants who cannot afford to pay for such services, in order to participate in authorized WIOA activities to successfully accomplish their training and/or employment goals. WIOA regulations allow Workforce Development Boards to establish limits on the provision of supportive services, including a maximum amount of funding and maximum length of time for such services available to enrolled WIOA participants.

Supportive services may be funded through other revenue sources. Additional supportive services will follow the guidance in this policy, unless otherwise identified by the grant program. Other funding sources may be used to provide supportive services beyond those allowable in this policy guidance if allowable under the specific funding stream.

#### QUESTIONS

Questions relating to this policy should be directed to ~~Marion Aiken, Workforce Services Director, at [maiken@solanowdb.org](mailto:maiken@solanowdb.org) or at (707) 863-3594~~ David Hubble, Executive Director at [dhubble@solanowdb.org](mailto:dhubble@solanowdb.org) or at (707) 863-3501.

#### ATTACHMENTS

- Attachment A: WIOA Youth 14-Elements
- Attachment B: Staff Acknowledgement

#### RESCISSIONS

This policy replaces and cancels the ~~2018-09~~ 2020-04 Supportive Services and Incentives Policy and 2020-04 Supportive Services and Incentives Policy, Change 1.

#### POLICY

Supportive services are provided to eligible WIOA Adults, Dislocated Workers and Youth when the supportive service will assist the participant with reaching his/her employment and training goals. Supportive services are based on need and participants are not automatically entitled to supportive services.

Supportive services may be made available to any Adult, Dislocated Worker, or Youth participating in Title I career services or training activities that is unable to obtain supportive services through other programs providing such services. Additionally, ~~the~~ supportive services must be necessary to enable the individual to participate in career services or training activities.

Supportive services may not be used to extend the date of exit for performance accountability purposes. Supportive services, like follow-up services, do not make an individual a participant nor extend participation.

### **SUPPORTIVE SERVICE ELIGIBILITY**

All support services are administered through WIOA staff. The use of these funds is based on funding availability. It is the responsibility of staff to ensure allowable, reasonable, and appropriate utilization of supportive service funds and determine if such assistance is available through other community service providers.

Supportive services may be provided to eligible WIOA participants who are enrolled in WIOA career or training services and are unable to obtain the supportive service through any other resource or program providing such services.

WIOA Youth participants may receive supportive service ~~funding may only be provided to WIOA Youth participants during program participation in WIOA activities. Youth may also receive supportive services as part of~~ who have exited and need post-program supportive services as follow-up services (for up to 12 months after exit) when such services are necessary to support employment or continued education and training. WIOA Adult and Dislocated Worker participants are not eligible for post-program supportive services.

WIOA supportive services are limited and must be coordinated with other community resources. In every instance of providing supportive services, staff must ensure that no other resource exists, that the resource is not readily available, or that the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant.

Supportive services may be utilized to assist in the participation of the following WIOA career services and training activities for Adults and Dislocated Workers:

- Career services:
  - Comprehensive and specialized assessments
  - Development of an Individual Employment Plan (IEP) or Individual Service Strategy (ISS)
  - Group counseling
  - Individual counseling
  - Career planning
  - Short-term prevocational services
  - Internships and work experiences
  - Workforce preparation activities
  - Financial literacy services
  - Out-of-area job search assistance and relocation assistance

- English language acquisition and integrated education and training programs
- Follow-up services, including counseling regarding the workplace, for participants who are placed in unsubsidized employment (for WIOA Youth only)
- Training activities:
  - Occupational skills training
  - On-the-Job Training
  - Incumbent worker training
  - Programs that combine workplace training with related instruction
  - Training programs operated by the private sector
  - Skill upgrading and retraining
  - Entrepreneurial training
  - Transitional jobs
  - Job readiness training or adult education and literacy activities provided in combination with services described above
  - Customized training

## **PROVISION OF SUPPORTIVE SERVICES**

### **Supportive Services Assessment and Planning**

WIOA program staff must determine and document supportive service needs during the initial objective assessment. As part of the assessment and IEP/ISS development, staff should develop a plan with the individual for how barriers will be addressed. The planning process must include exploration with the customer of viable alternative resources or programs available in the community before approval of supportive services funding.

Explanation of a lack of community resources or that the urgency of the needed service is such that referrals to other resources would delay the provision of the support service and create a hardship to the participant must be evident in CalJOBS case notes and in the participant file. Participant files must adequately document that all supportive services are allowable, reasonable, justified, and, when feasible, not otherwise available to the participant. Files must show evidence of referrals to other resources, including, when feasible, outcomes of the referral.

### **Requesting Supportive Services**

Supportive service requests should be initiated as part of the IEP/ISS plan or through a request from the participant. Supportive service requests should be based on the barriers identified within the initial intake and/or IEP/ISS. If a participant requests supportive services beyond barriers originally identified, the participant must provide justification for a change in barriers to the staff. Staff should document this change in a case note.

Staff must maintain a supportive service tracking log located in the participant's file that tracks the date of the service, type of service, amount of the service disbursed to the participant, and a current total of supportive services spent-to-date.

All supportive services are additionally contingent upon the customer's satisfactory performance while participating in and completing WIOA career services or training activities, as well as upon

available funding. To maintain satisfactory performance, a customer who is in training must maintain good attendance and passing grades and follow all other program requirements. For a customer who is participating in career services, they must follow program requirements, including active participation during the period of supportive service delivery.

### **ALLOWABLE SUPPORTIVE SERVICES**

Funds for supportive services are intended to support customers' efforts in training or career services or to assist with job placement needs. These funds are not intended to fully cover all costs associated with certain activities, rather to reduce barriers to such activities. Staff may ~~only~~ approve ~~funds for the types of~~ supportive services ~~and amounts described consistent with WIOA regulations and~~ in this policy. The Executive Director or Division ~~Manager~~ Director must approve all requests for services or costs that exceed ~~any limits the overall identified in~~ this policy and may make exceptions to this policy on a case by case basis. Detailed information on supportive service requests and process must be outlined in procedural documents.

The WDB recognizes the following types of allowable supportive services: emergency assistance, employability and training assistance, and needs-related payments.

#### **Emergency Assistance**

A participant may receive Emergency Assistance during WIOA participation if the support is determined necessary to facilitate or continue participation in WIOA-funded activities. When emergency assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation and that support is not accessible through other community means. Emergency assistance should only be issued once individuals have applied for applicable government or community benefits, unless the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant. If a participant is not deemed eligible for emergency assistance programs, WIOA can provide assistance through supportive service funds. If a participant is deemed eligible for emergency assistance programs, WIOA can provide assistance through supportive service funds until the benefit program begins. Emergency Assistance supportive services are based on funding availability and are not an entitlement.

Assistance may include, but is not limited to:

1. **Food Assistance** – Food assistance ~~can may~~ be provided in the form of grocery cards ~~or other appropriate methods when necessary to enable participation in WIOA activities. Food assistance may not exceed \$50 a week for single individuals or \$100 a week for families.~~ Individuals must apply for CalFresh benefits before this emergency assistance is ~~given~~ provided unless the need is so urgent that referral to other resources would delay assistance and create a hardship to the participant. *(Note: Food assistance is only allowable for WIOA Youth participants.)*
2. **Health Care and Medical Services** – These services are generally of a one-time nature or for a set period, such as prescription drugs, prescription eyeglasses, immediate dental care,

and mental health care, which are needed to enable an individual to effectively participate in activities.

3. **Housing** – Housing assistance may includes one-time supportive service payments for rent or mortgage assistance. Participants should have a plan for how they will fund the following month’s housing. When supportive service funds are used to pay this expense, documentation must be in the participant's file that verifies the address and rental amount. ~~Housing assistance may not exceed \$2,000.~~ Other types of housing assistance may be available. All housing assistance supportive service requests must be approved by the Executive Director or Division ~~Manager~~ Director in advance.
4. **Utilities** – One month’s payment of utilities is an allowable expense. Other available assistance programs must be explored before utilizing WIOA funding for utilities, such as utility provider assistance programs or other local community resources. ~~the Low-Income Home Energy Assistance Program (LIHEAP).~~ Participants should have a plan for how they will fund the following month’s utilities. ~~Utility assistance may not exceed \$300.~~

### **Employability and Training Assistance**

A participant may receive Employability and Training Assistance during WIOA participation if the support is determined necessary to: a) facilitate or continue participation or b) maintain or increase employability. When such assistance is provided, there must be a reasonable expectation that the assistance will allow the participant to complete training and/or obtain employment.

Assistance may include, but is not limited to:

1. **Transportation Assistance** – Staff may provide transportation assistance to participants for them to complete WIOA activities, such as job readiness activities, training, or initial employment. In the case of initial employment support, participants may receive transportation through their second paycheck.
  - a. *Public Transportation Assistance* – Program staff may issue a public transportation card, pass, or tokens. ~~not to exceed \$20 per day with a maximum of \$1,000 per customer per six-month period.~~ Customers may also be issued reimbursement funds for public transportation costs to and from employment and training sites.
  - b. *Private Transportation Assistance* – Customers may be reimbursed for driving expenses in the amount of the federal business mileage rate as set by the US Internal Revenue Service for mileage reimbursements to and from training sites, required employment or training-related appointments, interviews, or employment/work experience sites. Participants may also claim the cost of bridge tolls required to reach their approved destination. ~~Any mileage over 20 miles per day round trip plus tolls are reimbursable up to a maximum of \$1,000 per customer per six-month period.~~ Gas cards may be distributed in advance for transportation emergencies. ~~the process for approval must be outline in procedural documents.~~

- c. *Automotive Repairs* – Customers may receive ~~a one-time~~ reimbursement or payment directly made to the vendor for automotive repairs when the repair is necessary to enable the participant to attend training or employment. Automotive repairs are approved on a case-by-case basis and require the Division ~~Manager~~ Director or Executive Director’s approval. ~~The repair of an automobile must be necessary to enable a participant to attend training or employment. When supportive service funds are used to pay this expense, d~~Documentation must be included in the participant's file that verifies the repair needed and amount. ~~The maximum allowable for automotive repairs of \$1,000.~~
2. **Child/Dependent Care Assistance** – Child and dependent care assistance is a supportive service provided to participants if it is determined that without it a participant will not be able to participate in services or transition to employment. Childcare assistance may be provided to participants with children age twelve years or younger, or for a child/dependent is mentally and/or physically disabled and requires adult care. Childcare assistance will not be provided when a competent adult (over the age of 18 years) residing at the same address as the participant is available to provide childcare. Full-time childcare is defined as five (5) or more hours per day; while part-time childcare is less than five (5) hours per day.

The WDB uses a direct-referral method with Solano Family & Children Services (SFCS), a private, non-profit Child Care Resource & Referral Agency. SFCS provides services and support to parents, childcare providers, and community members in Solano County. Child/dependent care services shall be paid upon receipt of monthly invoices covering specified periods of care. ~~and will be paid up to a maximum of \$36.00 per day per infant or child, not to exceed \$2,500 per customer per six month period.~~

Child/dependent care referral agreements shall be authorized for a maximum of ten weeks; they can be renewable if needed (the need must be documented in case notes) and no other support assistance is available. Payment will be based on customer’s attendance; the applicable rate will be paid for each day of participation.

Childcare invoices will be paid only with the submission of documentation that includes verification from SFCS regarding the number of hours of care and that the hours correspond with the hours in the work experience/training activity.

3. **Medical Services** – These services are directly related to employment or training outcomes, and include medical services necessary to successfully complete training, gain licensure or certification, or obtain employment. Services include a physical examination or drug testing for employment or training purposes.
4. **Tools** – Tools may be purchased for participants if the tools are required to continue a training program or obtain employment. Staff must determine that the tools are required and that they cannot be provided by any-an other source, such as the prospective employer

or training provider. ~~Staff may provide financial assistance up to \$600.~~ Customers must be enrolled in training or have a firm employment offer before this expense can be approved ~~by staff.~~

5. **Work/Training Costs** – Financial assistance ~~will be limited to an amount not to exceed \$600 per customer for these items. The items must~~ may be provided for a work or training related activity necessary to support participation in approved WIOA activities. Examples include, but are not limited to, uniforms, books, educational testing or accommodations, scrubs, stethoscope, protective eye gear, blood pressure cuff, work or training-related licenses and permits, application fees, payments and fees for employment and training-related applications/tests/certifications, union dues or industry membership fees, and interview attire.
6. **Supportive Services Other** – Other supportive services may be provided as needed. Such goods and services should be reasonable and necessary for the participant to remain in training and/or obtain or retain employment. These services may include, but are not limited to:
  - i. Haircuts, personal grooming and hygiene needs;
  - ii. Bonding and liability insurance for employment (for instances where EDD bonding is not available);
  - iii. Internet services for distance learning purposes;
  - iv. Financial counseling or assistance;
  - v. Translation services;
  - vi. Legal aid services;
  - vii. Linkages to community services, such as alcohol/drug/gang intervention counseling, drop-out prevention, pregnancy prevention, money management, tutoring, or other purposes;
  - viii. Auxiliary aides and services for participants with disabilities; and
  - ix. Reasonable accommodations for individuals with disabilities.

NOTE: Training related expenses for WIOA eligible adults or older youth that may be covered by an Individual Training Account (ITA) do not count against the supportive services limit for each registered participant. ITA related training expenses may include but are not limited to assistance with the purchase of tools required for a specific course; current school admission fees, computer and lab fees; and books and supplies.

### **Needs-Related Payments**

WIOA Section 134(d)(3) defines Needs-Related Payments as supportive services provided to individuals enrolled in training services. Needs-Related Payments assist participants with necessary living expenses so they can successfully participate in and complete approved training activities.

Needs-Related Payments may be provided to eligible WIOA Adult and Dislocated Worker participants who are enrolled in training services and who are unemployed and do not qualify for, or who have ceased to qualify for, unemployment compensation.

Training services eligible for Needs-Related Payments include training services described in WIOA Section 134(c)(3)(D) and applicable federal regulations.

~~WIOA Sec. 134(d) defines Needs-Related Payments as supportive services for individuals enrolled in training services only. Needs-Related Payments can help individuals meet their non-training expenses and help them to complete training successfully. Funds may be used for Adults and Dislocated Workers who are unemployed and do not qualify for (or who have ceased to qualify for) unemployment compensation for the purposes of enabling individuals to participate in training programs.~~

~~Training services eligible for Needs-Related Payments are as follows:~~

- ~~• occupational skills training, including programs that combine workplace training with related instruction, which may include cooperative education programs;~~
- ~~• training programs operated by the private sector;~~
- ~~• entrepreneurial training;~~
- ~~• job readiness training or adult education and literacy activities provided in combination with any of the three training services above;~~
- ~~• Skills upgrading and retraining; and~~
- ~~• Customized training.~~

A Dislocated Worker who is unemployed and who ceases to qualify for unemployment compensation or Trade Readjustment Assistance, or who did not qualify for unemployment compensation, may receive Needs-Related Payments. To be eligible, the customer must be enrolled in training services:

- By the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for employment and training activities or
- If later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months.

Needs-Related Payments are ~~a direct~~ stipend payments to participants to support ~~their necessary~~ living costs during ~~the period of occupational training~~ participation in approved WIOA training services. Participants must have a documented financial need and complete the procedures outlined in procedural documents. ~~Needs-Related Payments are provided up to \$100 per week for a participant lifetime maximum of \$1,000. Dislocated Worker payments may not exceed the greater of their applicable level of unemployment compensation or, if the worker did not qualify for unemployment compensation, an amount equal to the poverty line for an equivalent period.~~

Needs-Related Payments cannot be issued before a participant is registered and enrolled in training. However, once enrolled, Needs-Related Payments may be provided for up to thirty (30) days prior to the start of training.

~~Eligibility for Needs-Related Payments is determined by household income and family size. Households with incomes above the self-sufficiency wage for family size and local area are not eligible for Needs-Related Payments. Needs-related payments cannot be issued before a participant is registered and enrolled in training; however, if enrolled, Needs-Related Payments may be provided to trainees for up to thirty (30) days prior to the start of training.~~

Needs-Related Payments have been classified as non-taxable income by the IRS. (See IRS Publication 525 – Work-training programs)

### **LIMITATIONS AND PAYMENTS**

The supportive services limit is ~~\$2,500~~\$5,000 for the duration of the customer's enrollment. Specific limits for individual supportive service categories will be established and maintained in internal program procedures. The Division ~~Manager~~ Director or Executive Director has the authority to increase this limit on a case-by-case basis if additional supportive services allocation would significantly benefit the participant's ability to continue and complete the program. Authorization to increase the supportive service limit above ~~\$2,500~~\$5,000 must be documented in case notes and the participant's file.

WIOA supportive service funding may not be utilized to pay for expenses incurred prior to the participant's enrollment into the WIOA program.

The following costs are disallowed WIOA supportive services:

- Fines and penalties such as traffic violations, late finance charges, and interest payments;
- Taxes;
- Child support;
- Bail or restitution;
- Entertainment including tips;
- Contributions or donations;
- Refundable deposits;
- Alcohol or tobacco products;
- Pet food;
- Items for family members or friends; or
- ~~Out-of-state job search and relocation expenses.~~

Procedures must outline a written fiscal process for the distribution and tracking of supportive service funds.

Supportive service payments should be issued directly to the party providing the service. Any supportive services payments paid directly to the vendor/provider must have a receipt from the vendor/provider that clearly shows the amount that was paid. Supportive service funds may also be reimbursed to the participant, provided prior authorization and proper documentation is received to verify funds were used for their intended purpose. Reimbursement payments will be made only with the submission of original or scanned and legible sales receipts that show itemization of the service and products provided, or in the case of mileage, through the submission of a mileage tracking form.

Supportive services in the form of pre-paid cards may be provided to the participant in advance, if financial or urgent need is demonstrated and documented in the participant's file. Fixed amount gift cards for a specific purpose given in advance requires receipts from the participant and case notes of such action in the participant's file. If participants do not return requested receipts of authorized and intended purchases, no further supportive services will be provided. Case notes must be entered into CalJOBS if a participant fails to return any receipts/documentation for the supportive services provided in full and include an explanation and attempts made to collect receipts.

~~Supportive services in the form of pre-paid cards may be provided to the participant in advance, if financial or urgent need is demonstrated and documented in the participant's file. Fixed amount gift cards for a specific purpose given in advance do not require provision of receipts from the participant; however, follow up communication of use of pre-paid cards should be case noted in the participant's file.~~

## **INCENTIVES FOR YOUTH**

Incentives are allowable for WIOA Youth participants only. Incentives are payments that are based on a participant's attendance and/or performance. The milestones allowable for incentive payments must be outlined in procedural documents and must correspond to the 14 Program Elements for Youth Programs (See Attachment A).

For incentive payments, staff must have copies of awards of attainments, such as certificates or diplomas, or other documentation verifying successful completion of the activity. Case notes must document why the incentive was provided, the amount of the incentive, and the date the participant received the incentive.

## **DISCLAIMER**

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

## **REFERENCES**

### **Law**

- Workforce Innovation and Opportunity Act (WIOA) of 2014
- AB-1270 California Workforce Innovation and Opportunity Act
- Senate Bill 734

### **Federal Guidance**

- Workforce Innovation and Opportunity Act Final Rule: 20 CFR Part 680 – Adult and Dislocated Worker Activities
- 20 CFR 68.900-680.970 – Supportive Services and Needs-Related Payments
- 20 CFR 681 – Youth Activities
- 20 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

- 20 CFR Part 2900 – Department of Labor Exceptions
- ~~Workforce Innovation and Opportunity Act Final Rule: 20 CFR Part 680-900-910 (Adult & Dislocated Worker) and 20 CFR Part 681-570 (Youth)~~
- Training and Employment Guidance Letter (TEGL) 10-16 Change 2 – Performance Accountability Guidance for WIOA Title I, Title II, Title III, and Title IV Programs
- Training and Employment Guidance Letter WIOA (TEGL) 19-16 – Guidance on Services Provided through the Adult and Dislocated Worker Programs under WIOA
- TEGL 21-16 – Third WIOA Title I Youth Formula Program Guidance

### **State Guidance**

- Workforce Service Directive (WSD) 18-12 – Supportive Services and Incentives
- ~~Workforce Service Directive (WSD) 17-07 – WIOA Youth Program Requirements~~

### **Approved by**

Workforce Development Board of Solano County

## **ATTACHMENT A: WIOA Youth 14 Program Elements**

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalency (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
  2. Alternative secondary school services, or dropout recovery services, as appropriate.
  3. Paid and unpaid work experiences that have as a component academic and occupational education may include:
    - a. Summer employment opportunities
    - b. Opportunities available throughout the school year
    - c. Pre-apprenticeship programs
    - d. Internships and job shadows
    - e. On-the-job training opportunities
  4. Occupational skills training which includes priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved.
  5. Education offered concurrently with an in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
  6. Leadership development opportunities, including community service and peer centered activities encouraging responsibility and other positive social and civic behaviors.
  7. Support Services are services that enable an individual to participate in WIOA activities.
  8. Adult Mentoring
  9. Follow-up services for not less than 12 months after the completion of participation.
  10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referrals to counseling, as appropriate to the needs of the individual youth.
  11. Financial literacy education
  12. Entrepreneurial skills training
  13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
- Activities that help youth prepare for and transition to post-secondary education and training.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

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EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
SUPPORTIVE SERVICES AND INCENTIVES POLICY  
(Issued March 20, 2026)

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The Workforce Development Board (WDB) of Solano County's Supportive Services and Incentives Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Supportive Services and Incentives Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

 <p><b>WORKFORCE DEVELOPMENT BOARD</b> OF SOLANO COUNTY</p>	<h2>POLICY ISSUANCE</h2>
<p>Date: March 20, 2026    Number: 2026-06</p>	

## SUPPORTIVE SERVICES AND INCENTIVES POLICY

### INTRODUCTION

This policy provides guidance to the Workforce Development Board (WDB) of Solano County in providing supportive services that are necessary to enable Workforce Innovation and Opportunity (WIOA) eligible individuals enrolled in the Adult, Dislocated Worker and Youth programs. These services are provided to enrolled participants who cannot afford to pay for such services, in order to participate in authorized WIOA activities to successfully accomplish their training and/or employment goals. WIOA regulations allow Workforce Development Boards to establish limits on the provision of supportive services, including a maximum amount of funding and maximum length of time for such services available to enrolled WIOA participants.

Supportive services may be funded through other revenue sources. Additional supportive services will follow the guidance in this policy, unless otherwise identified by the grant program. Other funding sources may be used to provide supportive services beyond those allowable in this policy guidance if allowable under the specific funding stream.

### QUESTIONS

Questions relating to this policy should be directed to David Hubble, Executive Director at [dhubble@solanowdb.org](mailto:dhubble@solanowdb.org) or at (707) 863-3501.

### ATTACHMENTS

- Attachment A: WIOA Youth 14-Elements
- Attachment B: Staff Acknowledgement

### RESCISSIONS

This policy replaces and cancels the 2020-04 Supportive Services and Incentives Policy and 2020-04 Supportive Services and Incentives Policy, Change 1.

### POLICY

Supportive services are provided to eligible WIOA Adults, Dislocated Workers and Youth when the supportive service will assist the participant with reaching his/her employment and training goals. Supportive services are based on need and participants are not automatically entitled to supportive services.

Supportive services may be made available to any Adult, Dislocated Worker, or Youth participating in Title I career services or training activities that is unable to obtain supportive

services through other programs providing such services. Additionally, supportive services must be necessary to enable the individual to participate in career services or training activities.

Supportive services may not be used to extend the date of exit for performance accountability purposes. Supportive services, like follow-up services, do not make an individual a participant nor extend participation.

### **SUPPORTIVE SERVICE ELIGIBILITY**

All support services are administered through WIOA staff. The use of these funds is based on funding availability. It is the responsibility of staff to ensure allowable, reasonable, and appropriate utilization of supportive service funds and determine if such assistance is available through other community service providers.

Supportive services may be provided to eligible WIOA participants who are enrolled in WIOA career or training services and are unable to obtain the supportive service through any other resource or program providing such services.

WIOA Youth participants may receive supportive service during program participation in WIOA activities. Youth may also receive supportive services as part of follow-up services for up to 12 months after exit when such services are necessary to support employment or continued education and training. WIOA Adult and Dislocated Worker participants are not eligible for post-program supportive services.

WIOA supportive services are limited and must be coordinated with other community resources. In every instance of providing supportive services, staff must ensure that no other resource exists, that the resource is not readily available, or that the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant.

Supportive services may be utilized to assist in the participation of the following WIOA career services and training activities for Adults and Dislocated Workers:

- Career services:
  - Comprehensive and specialized assessments
  - Development of an Individual Employment Plan (IEP) or Individual Service Strategy (ISS)
  - Group counseling
  - Individual counseling
  - Career planning
  - Short-term prevocational services
  - Internships and work experiences
  - Workforce preparation activities
  - Financial literacy services
  - Out-of-area job search assistance and relocation assistance
  - English language acquisition and integrated education and training programs
  - Follow-up services, including counseling regarding the workplace, for participants who are placed in unsubsidized employment (for WIOA Youth only)

- Training activities:
  - Occupational skills training
  - On-the-Job Training
  - Incumbent worker training
  - Programs that combine workplace training with related instruction
  - Training programs operated by the private sector
  - Skill upgrading and retraining
  - Entrepreneurial training
  - Transitional jobs
  - Job readiness training or adult education and literacy activities provided in combination with services described above
  - Customized training

## **PROVISION OF SUPPORTIVE SERVICES**

### **Supportive Services Assessment and Planning**

WIOA program staff must determine and document supportive service needs during the initial objective assessment. As part of the assessment and IEP/ISS development, staff should develop a plan with the individual for how barriers will be addressed. The planning process must include exploration with the customer of viable alternative resources or programs available in the community before approval of supportive services funding.

Explanation of a lack of community resources or that the urgency of the needed service is such that referrals to other resources would delay the provision of the support service and create a hardship to the participant must be evident in CalJOBS case notes and in the participant file. Participant files must adequately document that all supportive services are allowable, reasonable, justified, and, when feasible, not otherwise available to the participant. Files must show evidence of referrals to other resources, including, when feasible, outcomes of the referral.

### **Requesting Supportive Services**

Supportive service requests should be initiated as part of the IEP/ISS plan or through a request from the participant. Supportive service requests should be based on the barriers identified within the initial intake and/or IEP/ISS. If a participant requests supportive services beyond barriers originally identified, the participant must provide justification for a change in barriers to the staff. Staff should document this change in a case note.

Staff must maintain a supportive service tracking log located in the participant's file that tracks the date of the service, type of service, amount of the service disbursed to the participant, and a current total of supportive services spent-to-date.

All supportive services are additionally contingent upon the customer's satisfactory performance while participating in and completing WIOA career services or training activities, as well as upon available funding. To maintain satisfactory performance, a customer who is in training must maintain good attendance and passing grades and follow all other program requirements. For a

customer who is participating in career services, they must follow program requirements, including active participation during the period of supportive service delivery.

### **ALLOWABLE SUPPORTIVE SERVICES**

Funds for supportive services are intended to support customers' efforts in training or career services or to assist with job placement needs. These funds are not intended to fully cover all costs associated with certain activities, rather to reduce barriers to such activities. Staff may approve supportive services consistent with WIOA regulations and this policy. The Executive Director or Division Director must approve all requests for services or costs that exceed any limits identified in this policy and may make exceptions to this policy on a case by case basis. Detailed information on supportive service requests and process must be outlined in procedural documents.

The WDB recognizes the following types of allowable supportive services: emergency assistance, employability and training assistance, and needs-related payments.

#### **Emergency Assistance**

A participant may receive Emergency Assistance during WIOA participation if the support is determined necessary to facilitate or continue participation in WIOA-funded activities. When emergency assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation and that support is not accessible through other community means. Emergency assistance should only be issued once individuals have applied for applicable government or community benefits, unless the need is so urgent that referrals to other resources would delay the provision of the support service and create a hardship to the participant. If a participant is not deemed eligible for emergency assistance programs, WIOA can provide assistance through supportive service funds. If a participant is deemed eligible for emergency assistance programs, WIOA can provide assistance through supportive service funds until the benefit program begins. Emergency Assistance supportive services are based on funding availability and are not an entitlement.

Assistance may include, but is not limited to:

1. **Food Assistance** – Food assistance may be provided in the form of grocery cards or other appropriate methods when necessary to enable participation in WIOA activities. Individuals must apply for CalFresh benefits before this emergency assistance is provided unless the need is so urgent that referral to other resources would delay assistance and create a hardship to the participant. *(Note: Food assistance is only allowable for WIOA Youth participants.)*
2. **Health Care and Medical Services** – These services are generally of a one-time nature or for a set period, such as prescription drugs, prescription eyeglasses, immediate dental care, and mental health care, which are needed to enable an individual to effectively participate in activities.
3. **Housing** – Housing assistance may include one-time supportive service payment for rent or mortgage assistance. Participants should have a plan for how they will fund the

following month's housing. When supportive service funds are used to pay this expense, documentation must be in the participant's file that verifies the address and rental amount. Other types of housing assistance may be available. All housing assistance supportive service requests must be approved by the Executive Director or Division Director in advance.

4. **Utilities** – One month's payment of utilities is an allowable expense. Other available assistance programs must be explored before utilizing WIOA funding for utilities, such as utility provider assistance programs or other local community resources. Participants should have a plan for how they will fund the following month's utilities.

### **Employability and Training Assistance**

A participant may receive Employability and Training Assistance during WIOA participation if the support is determined necessary to: a) facilitate or continue participation or b) maintain or increase employability. When such assistance is provided, there must be a reasonable expectation that the assistance will allow the participant to complete training and/or obtain employment.

Assistance may include, but is not limited to:

1. **Transportation Assistance** – Staff may provide transportation assistance to participants for them to complete WIOA activities, such as job readiness activities, training, or initial employment. In the case of initial employment support, participants may receive transportation through their second paycheck.
  - a. *Public Transportation Assistance* – Program staff may issue a public transportation card, pass, or tokens. Customers may also be issued reimbursement funds for public transportation costs to and from employment and training sites.
  - b. *Private Transportation Assistance* – Customers may be reimbursed for driving expenses in the amount of the federal business mileage rate as set by the US Internal Revenue Service for mileage reimbursements to and from training sites, required employment or training-related appointments, interviews, or employment/work experience sites. Participants may also claim the cost of bridge tolls required to reach their approved destination. Gas cards may be distributed in advance for transportation emergencies.
  - c. *Automotive Repairs* – Customers may receive reimbursement or payment directly made to the vendor for automotive repairs when the repair is necessary to enable the participant to attend training or employment. Automotive repairs are approved on a case-by-case basis and require the Division Director or Executive Director's approval. Documentation must be included in the participant's file that verifies the repair needed and amount.

2. **Child/Dependent Care Assistance** – Child and dependent care assistance is a supportive service provided to participants if it is determined that without it a participant will not be able to participate in services or transition to employment. Childcare assistance may be provided to participants with children age twelve years or younger, or for a child/dependent is mentally and/or physically disabled and requires adult care. Childcare assistance will not be provided when a competent adult (over the age of 18 years) residing at the same address as the participant is available to provide childcare. Full-time childcare is defined as five (5) or more hours per day; while part-time childcare is less than five (5) hours per day.

The WDB uses a direct-referral method with Solano Family & Children Services (SFCS), a private, non-profit Child Care Resource & Referral Agency. SFCS provides services and support to parents, childcare providers, and community members in Solano County. Child/dependent care services shall be paid upon receipt of monthly invoices covering specified periods of care.

Child/dependent care referral agreements shall be authorized for a maximum of ten weeks; they can be renewable if needed (the need must be documented in case notes) and no other support assistance is available. Payment will be based on customer's attendance; the applicable rate will be paid for each day of participation.

Childcare invoices will be paid only with the submission of documentation that includes verification from SFCS regarding the number of hours of care and that the hours correspond with the hours in the work experience/training activity.

3. **Medical Services** – These services are directly related to employment or training outcomes, and include medical services necessary to successfully complete training, gain licensure or certification, or obtain employment. Services include a physical examination or drug testing for employment or training purposes.
4. **Tools** – Tools may be purchased for participants if the tools are required to continue a training program or obtain employment. Staff must determine that the tools are required and that they cannot be provided by another source, such as the prospective employer or training provider. Customers must be enrolled in training or have a firm employment offer before this expense can be approved.
5. **Work/Training Costs** – Financial assistance may be provided for a work or training related activity necessary to support participation in approved WIOA activities. Examples include, but are not limited to, uniforms, books, educational testing or accommodations, scrubs, stethoscope, protective eye gear, blood pressure cuff, work or training-related licenses and permits, application fees, payments and fees for employment and training-related applications/tests/certifications, union dues or industry membership fees, and interview attire.
6. **Supportive Services Other** – Other supportive services may be provided as needed. Such goods and services should be reasonable and necessary for the participant to remain in

training and/or obtain or retain employment. These services may include, but are not limited to:

- i. Haircuts, personal grooming and hygiene needs;
- ii. Bonding and liability insurance for employment (for instances where EDD bonding is not available);
- iii. Internet services for distance learning purposes;
- iv. Financial counseling or assistance;
- v. Translation services;
- vi. Legal aid services;
- vii. Linkages to community services, such as alcohol/drug/gang intervention counseling, drop-out prevention, pregnancy prevention, money management, tutoring, or other purposes;
- viii. Auxiliary aides and services for participants with disabilities; and
- ix. Reasonable accommodations for individuals with disabilities.

NOTE: Training related expenses for WIOA eligible adults or older youth that may be covered by an Individual Training Account (ITA) do not count against the supportive services limit for each registered participant. ITA related training expenses may include but are not limited to assistance with the purchase of tools required for a specific course; current school admission fees, computer and lab fees; and books and supplies.

### **Needs-Related Payments**

WIOA Section 134(d)(3) defines Needs-Related Payments as supportive services provided to individuals enrolled in training services. Needs-Related Payments assist participants with necessary living expenses so they can successfully participate in and complete approved training activities.

Needs-Related Payments may be provided to eligible WIOA Adult and Dislocated Worker participants who are enrolled in training services and who are unemployed and do not qualify for, or who have ceased to qualify for, unemployment compensation.

Training services eligible for Needs-Related Payments include training services described in WIOA Section 134(c)(3)(D) and applicable federal regulations.

A Dislocated Worker who is unemployed and who ceases to qualify for unemployment compensation or Trade Readjustment Assistance, or who did not qualify for unemployment compensation, may receive Needs-Related Payments. To be eligible, the customer must be enrolled in training services:

- By the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility for employment and training activities or
- If later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months.

Needs-Related Payments are direct payments to participants to support necessary living costs during participation in approved WIOA training services. Participants must have a documented financial need and complete the procedures outlined in procedural documents.

Needs-Related Payments cannot be issued before a participant is registered and enrolled in training. However, once enrolled, Needs-Related Payments may be provided for up to thirty (30) days prior to the start of training.

Needs-Related Payments have been classified as non-taxable income by the IRS. (See IRS Publication 525 – Work-training programs)

### **LIMITATIONS AND PAYMENTS**

The supportive services limit is \$5,000 for the duration of the customer’s enrollment. Specific limits for individual supportive service categories will be established and maintained in internal program procedures. The Division Director or Executive Director has the authority to increase this limit on a case-by-case basis if additional supportive services allocation would significantly benefit the participant’s ability to continue and complete the program. Authorization to increase the supportive service limit above \$5,000 must be documented in case notes and the participant’s file.

WIOA supportive service funding may not be utilized to pay for expenses incurred prior to the participant's enrollment into the WIOA program.

The following costs are disallowed WIOA supportive services:

- Fines and penalties such as traffic violations, late finance charges, and interest payments;
- Taxes;
- Child support;
- Bail or restitution;
- Entertainment including tips;
- Contributions or donations;
- Refundable deposits;
- Alcohol or tobacco products;
- Pet food;
- Items for family members or friends; or

Procedures must outline a written fiscal process for the distribution and tracking of supportive service funds.

Supportive service payments should be issued directly to the party providing the service. Any supportive services payments paid directly to the vendor/provider must have a receipt from the vendor/provider that clearly shows the amount that was paid. Supportive service funds may also be reimbursed to the participant, provided prior authorization and proper documentation is received to verify funds were used for their intended purpose. Reimbursement payments will be made only with the submission of original or scanned and legible sales receipts that show

itemization of the service and products provided, or in the case of mileage, through the submission of a mileage tracking form.

Supportive services in the form of pre-paid cards may be provided to the participant in advance, if financial or urgent need is demonstrated and documented in the participant's file. Fixed amount gift cards for a specific purpose given in advance requires receipts from the participant and case notes of such action in the participant's file. If participants do not return requested receipts of authorized and intended purchases, no further supportive services will be provided. Case notes must be entered into CalJOBS if a participant fails to return any receipts/documentation for the supportive services provided in full and include an explanation and attempts made to collect receipts.

### **INCENTIVES FOR YOUTH**

Incentives are allowable for WIOA Youth participants only. Incentives are payments that are based on a participant's attendance and/or performance. The milestones allowable for incentive payments must be outlined in procedural documents and must correspond to the 14 Program Elements for Youth Programs (See Attachment A).

For incentive payments, staff must have copies of awards of attainments, such as certificates or diplomas, or other documentation verifying successful completion of the activity. Case notes must document why the incentive was provided, the amount of the incentive, and the date the participant received the incentive.

### **DISCLAIMER**

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

### **REFERENCES**

#### **Law**

- Workforce Innovation and Opportunity Act (WIOA) of 2014
- AB-1270 California Workforce Innovation and Opportunity Act
- Senate Bill 734

#### **Federal Guidance**

- Workforce Innovation and Opportunity Act Final Rule: 20 CFR Part 680 – Adult and Dislocated Worker Activities
- 20 CFR 68.900-680.970 – Supportive Services and Needs-Related Payments
- 20 CFR 681 – Youth Activities
- 20 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 20 CFR Part 2900 – Department of Labor Exceptions
- Training and Employment Guidance Letter (TEGL) 10-16 Change 2 – Performance Accountability Guidance for WIOA Title I, Title II, Title III, and Title IV Programs

- Training and Employment Guidance Letter WIOA (TEGL) 19-16 – [Guidance on Services Provided through the Adult and Dislocated Worker Programs under WIOA](#)
- TEGL 21-16 – [Third WIOA Title I Youth Formula Program Guidance](#)

**State Guidance**

- Workforce Service Directive (WSD) 18-12 – Supportive Services and Incentives

**Approved by**

Workforce Development Board of Solano County

## **ATTACHMENT A: WIOA Youth 14 Program Elements**

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalency (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
  2. Alternative secondary school services, or dropout recovery services, as appropriate.
  3. Paid and unpaid work experiences that have as a component academic and occupational education may include:
    - a. Summer employment opportunities
    - b. Opportunities available throughout the school year
    - c. Pre-apprenticeship programs
    - d. Internships and job shadows
    - e. On-the-job training opportunities
  4. Occupational skills training which includes priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved.
  5. Education offered concurrently with an in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
  6. Leadership development opportunities, including community service and peer centered activities encouraging responsibility and other positive social and civic behaviors.
  7. Support Services are services that enable an individual to participate in WIOA activities.
  8. Adult Mentoring
  9. Follow-up services for not less than 12 months after the completion of participation.
  10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referrals to counseling, as appropriate to the needs of the individual youth.
  11. Financial literacy education
  12. Entrepreneurial skills training
  13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
- Activities that help youth prepare for and transition to post-secondary education and training.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

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EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
SUPPORTIVE SERVICES AND INVENTIVES POLICY  
(Issued March 20, 2026)

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The Workforce Development Board (WDB) of Solano County's Supportive Services and Incentives Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the Supportive Services and Incentives Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Supportive Services and Incentives Policy Revision Summary (2026-05)

### Section 6 – Supportive Service Eligibility

**Change:** Revised language to clarify that WIOA Youth participants may receive supportive services during participation and as part of follow-up services for up to 12 months after exit.

**Reason:** Clarifies the availability of supportive services for youth during both program participation and the follow-up period to support continued employment, education, or training outcomes, consistent with federal youth program requirements (20 CFR 681.570).

### Section 8 – Allowable Supportive Services

**Change:** Removed individual supportive service category caps from the policy and updated language throughout the section to maintain descriptions of allowable supportive service categories using flexible wording such as “may be provided” and “may include but are not limited to.”

**Reason:** Supportive service limits will be maintained in internal program procedures rather than policy to allow operational flexibility and reduce the need for policy amendments when program needs or economic conditions change. The revision maintains the allowable supportive service categories consistent with federal guidance governing supportive services and local board discretion in determining supportive service delivery based on participant need and funding availability (WIOA Section 134(d)(2); 20 CFR 680.900; WSD 18-12).

### Section 8 Subsection – Needs-Related Payments

**Change:** Removed the category cap, corrected the citation for Needs-Related Payments, and revised training eligibility language to reference training services described in WIOA Section 134(c)(3)(D) rather than listing individual training types.

**Reason:** Clarifies the statutory authority for Needs-Related Payments and ensures the policy aligns with federal regulations governing supportive services for participants enrolled in training. Referencing the statutory training provision avoids the risk of maintaining an incomplete or outdated list of training services (WIOA Section 134(d)(3); WIOA Section 134(c)(3)(D); 20 CFR 680.930–680.970).

### Section 9 – Limitations and Payments

**Change:** Increased the overall supportive services limit to \$5,000 and clarified that specific limits for individual supportive service categories will be established and maintained in internal program procedures. Incorporated provisions from the 2020-04 Supportive Services and Incentives Policy Change 1 regarding the use of pre-paid cards into the main policy.

**Reason:** Increasing the overall supportive services limit allows the WDB to better address participant barriers to employment and training in response to current economic conditions and rising costs. Maintaining specific service limits in internal procedures provides operational flexibility while ensuring services remain allowable and necessary to support participation in WIOA career and training services (WIOA Section 134(d)(2); 20 CFR 680.900). Incorporating pre-paid card provisions consolidates previous policy changes into a single governing document.

**Change:** Removed the out-of-state job search and relocation assistance as a disallowed cost (listed in both Career Services and disallowed)

**Reason:** Clarifies that allowable job search and relocation assistance may be provided when appropriate while ensuring supportive service expenditures remain compliant with federal cost principles governing allowable use of federal funds (2 CFR Part 200; 20 CFR 680.900).

## **Section 12 - References**

**Change:** Updated the References section incorporate applicable federal cost principles for WIOA program administration, and remove state directives that are not applicable to the Supportive Services and Incentives Policy.

**Reason:** Ensures the policy references the correct federal regulatory sections governing supportive services and Needs-Related Payments and incorporates the most current federal and state implementation guidance for WIOA programs (20 CFR 680.900–680.970; TEGL 10-16 Change 2; TEGL 19-16 Change 1; TEGL 21-16 Change 2; WSD 18-12; WSD 23-01).



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM X.D**

**March 20, 2026**

<p><b>SUBJECT</b> Review and Approval of the On-the-Job Training Policy (2026-07)</p>	<p><b>ATTACHMENTS</b> A, B, C</p>
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**RECOMMENDATION**

Staff recommend the review and approve WDB Policy 2026-07 On-the-Job Training Policy, as revised.

Attachment A – redlined version of policy 2018-07

Attachment B – draft version of revised policy 2026-07

Attachment C – summary of changes

**DISCUSSION**

To ensure continued compliance with the Workforce Innovation and Opportunity Act (WIOA) and related programmatic requirements, the Workforce Development Board (WDB) periodically reviews and updates its policies as needed. As part of this process, staff conducted a review of the On-the-Job Training (OJT) Policy to ensure alignment with current federal regulations, state guidance, and local administrative practices.

The review identified areas where updates were necessary to improve clarity, ensure consistency with WIOA requirements governing OJT activities, and reflect current program practices. Revisions were made to clarify eligibility provisions, contract parameters, reimbursement provisions, and to update regulatory references to current federal and state guidance.

**OVERVIEW**

This policy establishes the parameters for providing On-the-Job Training under the WIOA Adult, Dislocated Worker, and Youth programs. OJT is a work-based training strategy that allows participants to gain occupational skills while employed, with employers receiving reimbursement for a portion of the participant’s wages during the training period.

Updates clarify eligibility provisions, including participation by WIOA Youth and the criteria used to determine participant eligibility and self-sufficiency standards, ensuring consistent application of WIOA program requirements.

Revisions to the contract parameters emphasize that the duration and structure of OJT training are based on an assessment of the participant’s skill gaps and the requirements of the occupation. The policy also clarifies that reference tools such as O\*NET and Specific Vocational Preparation (SVP) levels may be used to support training plan development while allowing flexibility in determining appropriate training duration. The training hour limits associated with SVP levels were also updated to better align training duration with occupational skill requirements and ensure participants have adequate time to develop the skills needed to achieve proficiency in the job.

Additional updates clarify the allowable reimbursement rates available for OJT contracts and require that the reimbursement rate be documented in the OJT contract prior to the start of the training period to ensure compliance with monitoring and documentation requirements. The policy also clarifies that training plans may be modified when additional training time is necessary, provided the modification is agreed upon by the employer and the WDB and remains consistent with the approved contract.

Finally, the policy updates language related to youth participation in OJT activities, nondiscrimination requirements, and regulatory references to ensure alignment with current federal regulations and state guidance.

Overall, these revisions strengthen the policy by clarifying program requirements, aligning the policy with current regulatory guidance, and maintaining flexibility in the administration of OJT activities.

**REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Dave Hubble at 707-863-3501 if you have any questions regarding the information outlined in this report.



WORKFORCE DEVELOPMENT BOARD  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: ~~September 21, 2018~~ March 20, 2026 Number:  
~~2018-07~~ 2026-07

### ON-THE-JOB TRAINING POLICY

#### INTRODUCTION

This policy provides guidance in providing On-The-Job Training (OJT) services to eligible Workforce Innovation and Opportunity Act (WIOA) Adults, Dislocated Workers, and Youth. WIOA ~~provides for~~ allows states and local workforce development areas to ~~provide a standard of up to 50% of the wage rate of the participant to reimburse~~ employers for a portion of a ~~the costs of training while the participant's wages to offset the costs associated with training and supervision during the OJT period. is in the program.~~ The purpose of the OJT is to provide eligible participants with structured occupational skills training on an actual job worksite, to expose them to the same employment conditions as any other member of the employer's workforce, and to offer them continued, unsubsidized employment opportunities or other allowable positive outcomes upon completion of their training. The following provides information on the minimum requirements/elements for OJT.

#### QUESTIONS

Questions relating to this policy should be directed to ~~Marion Aiken, Workforce Services Manager, at [maiken@solanowdb.org](mailto:maiken@solanowdb.org) or at (707) 863-3594~~ David Hubble, Executive Director, at [dhubble@solanowdb.org](mailto:dhubble@solanowdb.org) or at (707) 863-3501.

#### ATTACHMENTS

None

#### RECISSIONS

This policy replaces and cancels the 2018-07 On-the-Job Training Policy, 2018-07 On-the-Job Training Policy, Change 1 and 2018-07 On-the-Job Training Policy, Change 2.

#### POLICY

On-the-Job Training (OJT) is training by an employer that is provided to a paid participant while engaged in productive work in a job that:

1. Provides knowledge or skills essential to the full and adequate performance of the job;
2. Is made available through a program that provides reimbursement to the employer ~~of up to 50% of the wage rate of the participant~~ for the extraordinary costs of providing the training and additional supervision related to the training; and

3. Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

An OJT is provided ~~through by~~ an employer to a participant. ~~An OJT opportunities~~ may be provided by ~~an employer~~s in the public, private non-profit, or private sector. OJTs may also be provided by a registered apprenticeship program sponsor for the OJT portion of the registered apprenticeship.

An OJT is an effective training tool for eligible WIOA program participants because it combines working and earning wages, while gaining the additional skills needed to be successful on the job. It is a form of training that helps participants who have been unsuccessful in finding employment to become gainfully employed while training. As such, OJTs are not a wage subsidy to employers for hiring of an employee. Rather, OJT funds are deemed to be compensation for the extraordinary costs associated with training participants and the costs associated with the lower productivity of the participants while they are in training. Employers are not required to document such extraordinary costs.

### **OJT ELIGIBILITY**

To be eligible for OJT services, the trainee ~~can be an unemployed worker~~ may be an eligible WIOA Adult, Dislocated Worker, or Youth participant who requires training to obtain the skills necessary to become proficient in the job for which they have been hired or an employee earning less than the self-sufficiency standard for the county of residence.

To be eligible for an OJT, an unemployed worker must:

1. Be enrolled in the WIOA program;
2. Have participated in assessment activities;
3. Have ~~a~~ completed an Individual Service Strategy for Youth participants (youth) or an Individual Employment Plan for (a) Adults and (d) Dislocated wWorkers) participants;  
**and**
4. Have been referred to and hired by an employer, but need specific skills in order to become proficient on the job.

To be eligible for an OJT, an employed worker must:

1. Meet conditions 1-4 under unemployed worker eligibility above;
2. Be earning less than ~~the~~ self-sufficiency wage standard, (as determined by Workforce Development Board of Solano County (the WDB) policy), or receiving wages less than 80% of wages from previous employer; **and**
3. Need specific skills related to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes.

To be eligible to sponsor an OJT, an employer must:

1. Have been established at their current location for 120 days;

2. Be in good financial standing at the federal and state level; **and**
3. ~~When applicable, demonstrate a good faith effort to retain~~ Have provided previous OJT participants, ~~if applicable, with continued long-term employment after the OJT period as regular employees with wages, and employment benefits, (including health benefits) and working conditions comparable to similarly situated employees. at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.~~

### CONTRACT PARAMETERS

OJT contracts must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participants' Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

A skills gap analysis must be conducted to identify the skills the participant must obtain during the training period. O\*NET<sup>et</sup> job zones and Specific Vocational Preparation (SVP) levels may be used as a reference when determining the appropriate length of the training contract for the occupation for which the OJT is being developed. ~~The OJT maximum hours limits are set based on the Specific Vocational Preparation (SVP) codes for job zones identified for the occupation on O\*Net.~~

SVP Code	Job Zone	Maximum Hours of Training
3	1	360 hours
4	2	520 hours
5	2	680 hours
6	3	840 hours
7	4	1,040 hours

~~OJT contracts exceeding the maximum training hours listed above~~ Higher additional SVP code OJTs may be ~~provided~~ considered with WDB Management approval when justified by the training requirements of the occupation. Based on the skills gap analysis, a training plan must be developed prior to OJT program start. The skills gap analysis must be documented in the participant file and included in the case notes.

Employers may be reimbursed under an OJT contract for up to 50% of the wages rate of the participant. ~~for the contract period. WDB staff may also negotiate~~ The reimbursement rates may be established at a level below of less than the allowed maximums allowable percentage. There are also instances when the reimbursement percentage may be up to 75%, when taking into account the following factors:

- ~~The characteristics of the participants (e.g. length of unemployment, current skill level, and barriers to employment);~~
- ~~The size of the employer (e.g. small and medium-sized business often have more barriers to participation at lower reimbursement rates);~~

- ~~• The quality of employer provided training and advancement opportunities; **and**~~
- ~~• Other factors the WDB may determine appropriate (e.g. the number of employees participating in the training, wage and benefit levels of the employees (both pre and post participation earnings), and relation of the training to the competitiveness of the participant).~~

~~All contracts proposed at 75% reimbursement must be approved by the Planning and Oversight Committee of the Workforce Development Board. Factors used when increasing the wage reimbursement level from 50% to 75% must be documented by staff and included in the contract file.~~

The reimbursement rate may be increased to up to 75 percent of the participant's wage rate when taking into account factors such as the characteristics of the participant (including barriers to employment), the size of the employer, the quality of employer-provided training and advancement opportunities, wage levels, and other factors determined appropriate by the Workforce Development Board. OJT contracts proposed at the 75 percent reimbursement level must be approved by the Executive Director, except when an employer hires a participant with a disability. Justification supporting the use of the increased reimbursement rate must be documented by staff and maintained in the OJT contract file.

When authorized through an approved federal or state Workforce Innovation and Opportunity Act (WIOA) waiver, employers with 50 or fewer employees may be reimbursed up to 90 percent of the participant's wage rate for the duration of the waiver period. Documentation supporting the use of the waiver and the reimbursement rate must be included in the OJT contract file.

The reimbursement rate must be established in the OJT contract prior to the start of the training period.

The WDB requires a written, signed agreement between WDB and an authorized employer representative prior to the start of work. At a minimum, an OJT contract between the WDB and an employer must comply with the requirements of Sections 194(1) and (4) of WIOA and include:

1. The occupation(s) for which training is to be provided;
2. The duration of the training;
3. The wage rate to be paid to the trainee/participant;
4. The rate of reimbursement;
5. The maximum amount of the reimbursement;
6. A training plan that outlines the occupational areas or skills the participant will be trained to perform, specific measurable objectives, and number of hours of training required to obtain those skills;
7. A description of any other separate classroom training that may be provided by the employer;
8. The employer's agreement to maintain and make available time and attendance, payroll, and other records to support amounts claimed by the employer for reimbursement under the OJT contract; **and**
9. Required written assurance clauses.

A progress and final evaluation must be completed by the OJT employer to evaluate the participant's progress in obtaining of the skills ~~during the OJT program as~~ outlined in the training plan. In the event that the initial training plan does not provide enough time for the participant to successfully obtain the necessary skills, ~~needed for the job, a revised~~ the training plan may be ~~developed~~ revised with agreement from the employer and WDB. Any modification to the training plan must remain consistent with the occupational skill requirements and the approved OJT contract. ~~to accommodate additional training time, provided that the total time does not exceed the maximum period identified by the occupation's job zone.~~ All documentation related to the OJT contract, training plan, evaluations, and reimbursement must be included in the participant's program ~~participant's~~ file.

~~In most cases, OJT is not considered to be an appropriate training activity for individuals under the age of 18. If staff wishes to utilize this vehicle on behalf of a participant under the age of 18, prior written authorization must be obtained from WDB Management. On-the-Job Training opportunities may be provided to eligible Youth participants as a form of paid work experience when appropriate and consistent with Workforce Innovation and Opportunity Act (WIOA) Youth program requirements. OJT for participants under the age of 18 requires WDB management approval. When providing OJT to participants under the age of 18, the WDB and participating employers must ensure compliance with applicable federal, state, and local labor laws governing the employment of minors.~~

It is the intent of the WDB to use OJT contracts for positions that pay at or above the self-sufficiency standard.

### **CONTRACT ASSURANCES**

In the contractual language, the employer must comply with the following standards:

1. Participants/trainees shall be compensated at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates must be in accordance with applicable law, but may not be less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the applicable State or local minimum wage law.
2. Participants/trainees shall be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
3. Health and safety standards established under Federal and State law otherwise applicable to working conditions of employees are equally applicable to working conditions of participants/trainees engaged in the OJT.
4. Workers' compensation insurance must be provided to participants/trainees engaged in the OJT on the same basis as the compensation is provided to other individuals in the State in similar employment.
5. The employer is in compliance with applicable Federal and State laws ~~including those laws pertaining to nondiscrimination based on race, color, sex, religions, national origin, age, disability, sexual orientation,~~ and marital status equal opportunity.

6. The employer is not experiencing abnormal labor conditions such as strikes, lockouts, or layoffs.
7. The OJT participant/trainee will not displace (including partial displacement, such as reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee at the date of participation.
8. The OJT participant/trainee will not be employed in or assigned to a job as a result of a layoff from the same or any substantially equivalent job; a result of termination of the employment of any regular, unsubsidized employee; or that in any way infringes on the promotional opportunities of currently employed workers at the date of participation.
9. The employer or immediate supervisor is not providing OJT training to a member of his/her immediate family (defined as: wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, grandparent or grandchild).
10. No funds provided to employers for OJT are used to employ the participant/trainee in a position involving political activities.
11. No funds provided to employers for OJT are used to directly or indirectly assist, promote or deter union organizing.
12. No funds provided to employers for OJT are used in the employment or training of participants/trainees involved in the construction, operation, or maintenance of that part of a facility which is used for religious instruction or worship (sectarian activities).
13. The OJT is not impairing existing contracts for services or collective bargaining agreements. If an OJT activity would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the OJT begins.

## **DISCLAIMER**

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

## **REFERENCES**

### **Law**

- Workforce Innovation and Opportunity Act (WIOA) of 2014

### **Federal Guidance**

- [Workforce Innovation and Opportunity Act \(WIOA\) Final Rule: 20 CFR Part 680 – 683 Adult and Dislocated Worker Activities under Title I of WIOA](#)
- [Workforce Innovation and Opportunity Act \(WIOA\) Final Rule: 20 CFR Part 681 – Youth Activities under Title I of WIOA](#)
- [Workforce Innovation and Opportunity Act \(WIOA\) Final Rule: 20 CFR Part 683 – Administrative Provisions under Title I WIOA](#)
- [WIOA Nondiscrimination and Equal Opportunity Regulations: 29 CFR Part 38](#)

- Training and Employment Guidance Letter WIOA (TEGL) 19-16 – [Guidance on Services provided through the Adult and Dislocated Worker Programs under WIOA and Wagner-Peyser Act Employment Services, as amended by WIOA](#)
- Training and Employment Guidance Letter WIOA (TEGL) 3-15 – [Guidance on Services Provided Through the Adult and Dislocated Worker Programs Under WIOA](#)

State Guidance

- [EDD Workforce Services Directive \(WSD\) 24-14 – On-the-Job Training Employer Reimbursement Waiver](#)

**Approved by**

Workforce Development Board of Solano County



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

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EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
ON-THE-JOB-TRAINING POLICY  
(Issued March 20, 2026)

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The Workforce Development Board (WDB) of Solano County's On-the-Job Training Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the On-the-Job Training Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult with my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

## POLICY ISSUANCE

Date: March 20, 2026

Number: 2026-07

### ON-THE-JOB TRAINING POLICY

#### INTRODUCTION

This policy provides guidance in providing On-The-Job Training (OJT) services to eligible Workforce Innovation and Opportunity Act (WIOA) Adults, Dislocated Workers, and Youth. WIOA allows states and local workforce development areas to reimburse employers for a portion of a participant's wages to offset the costs associated with training and supervision during the OJT period. The purpose of the OJT is to provide eligible participants with structured occupational skills training on an actual job worksite, to expose them to the same employment conditions as any other member of the employer's workforce, and to offer them continued, unsubsidized employment opportunities or other allowable positive outcomes upon completion of their training. The following provides information on the minimum requirements/elements for OJT.

#### QUESTIONS

Questions relating to this policy should be directed to David Hubble, Executive Director, at [dhubble@solanowdb.org](mailto:dhubble@solanowdb.org) or at (707) 863-3501.

#### ATTACHMENTS

None

#### RECISSIONS

This policy replaces and cancels the 2018-07 On-the-Job Training Policy, 2018-07 On-the-Job Training Policy, Change 1 and 2018-07 On-the-Job Training Policy, Change 2.

#### POLICY

On-the-Job Training (OJT) is training by an employer that is provided to a paid participant while engaged in productive work in a job that:

1. Provides knowledge or skills essential to the full and adequate performance of the job;
2. Is made available through a program that provides reimbursement to the employer for the extraordinary costs of providing the training and additional supervision related to the training; and
3. Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

An OJT is provided by an employer to a participant. OJT opportunities may be provided by employers in the public, private non-profit, or private sector. OJTs may also be provided by a registered apprenticeship program sponsor for the OJT portion of the registered apprenticeship.

An OJT is an effective training tool for eligible WIOA program participants because it combines working and earning wages, while gaining the additional skills needed to be successful on the job. It is a form of training that helps participants who have been unsuccessful in finding employment to become gainfully employed while training. As such, OJTs are not a wage subsidy to employers for hiring of an employee. Rather, OJT funds are deemed to be compensation for the extraordinary costs associated with training participants and the costs associated with the lower productivity of the participants while they are in training. Employers are not required to document such extraordinary costs.

### **OJT ELIGIBILITY**

To be eligible for OJT services, the trainee may be an eligible WIOA Adult, Dislocated Worker, or Youth participant who requires training to obtain the skills necessary to become proficient in the job for which they have been hired or an employee earning less than the self-sufficiency standard for the county of residence.

To be eligible for an OJT, an unemployed worker must:

1. Be enrolled in the WIOA program;
2. Have participated in assessment activities;
3. Have completed an Individual Service Strategy for Youth participants or an Individual Employment Plan for Adult and Dislocated Worker participants; **and**
4. Have been referred to and hired by an employer, but need specific skills in order to become proficient on the job.

To be eligible for an OJT, an employed worker must:

1. Meet conditions 1-4 under unemployed worker eligibility above;
2. Be earning less than the self-sufficiency standard, as determined by the WDB, or receiving wages less than 80% of wages from previous employer; **and**
3. Need specific skills related to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes.

To be eligible to sponsor an OJT, an employer must:

1. Have been established at their current location for 120 days;
2. Be in good financial standing at the federal and state level; **and**
3. When applicable, demonstrate a good faith effort to retain OJT participants as regular employees with wages, benefits, and working conditions comparable to similarly situated employees.

### **CONTRACT PARAMETERS**

OJT contracts must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participants' Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

A skills gap analysis must be conducted to identify the skills the participant must obtain during the training period. O\*NET job zones and Specific Vocational Preparation (SVP) levels may be used as a reference when determining the appropriate length of the training contract for the occupation for which the OJT is being developed.

<b>SVP Code</b>	<b>Job Zone</b>	<b>Maximum Hours of Training</b>
3	1	360 hours
4	2	520 hours
5	2	680 hours
6	3	840 hours
7	4	1,040 hours

OJT contracts exceeding the maximum training hours listed above may be considered with WDB Management approval when justified by the training requirements of the occupation. Based on the skills gap analysis, a training plan must be developed prior to OJT program start. The skills gap analysis must be documented in the participant file and included in the case notes.

Employers may be reimbursed under an OJT contract for up to 50% of the wage rate of the participant. The reimbursement rate may be established at a level below the maximum allowable percentage.

The reimbursement rate may be increased to up to 75 percent of the participant's wage rate when taking into account factors such as the characteristics of the participant (including barriers to employment), the size of the employer, the quality of employer-provided training and advancement opportunities, wage levels, and other factors determined appropriate by the Workforce Development Board. OJT contracts proposed at the 75 percent reimbursement level must be approved by the Executive Director, except when an employer hires a participant with a disability. Justification supporting the use of the increased reimbursement rate must be documented by staff and maintained in the OJT contract file.

When authorized through an approved federal or state Workforce Innovation and Opportunity Act (WIOA) waiver, employers with 50 or fewer employees may be reimbursed up to 90 percent of the participant's wage rate for the duration of the waiver period. Documentation supporting the use of the waiver and the reimbursement rate must be included in the OJT contract file.

The reimbursement rate must be established in the OJT contract prior to the start of the training period.

The WDB requires a written, signed agreement between WDB and an authorized employer representative prior to the start of work. At a minimum, an OJT contract between the WDB and an employer must comply with the requirements of Sections 194(1) and (4) of WIOA and include:

1. The occupation(s) for which training is to be provided;
2. The duration of the training;
3. The wage rate to be paid to the trainee/participant;
4. The rate of reimbursement;
5. The maximum amount of the reimbursement;
6. A training plan that outlines the occupational areas or skills the participant will be trained to perform, specific measurable objectives, and number of hours of training required to obtain those skills;
7. A description of any other separate classroom training that may be provided by the employer;
8. The employer's agreement to maintain and make available time and attendance, payroll, and other records to support amounts claimed by the employer for reimbursement under the OJT contract; **and**
9. Required written assurance clauses.

A progress and final evaluation must be completed by the OJT employer to evaluate the participant's progress in obtaining the skills outlined in the training plan. In the event that the initial training plan does not provide enough time for the participant to successfully obtain the necessary skills, the training plan may be revised with agreement from the employer and WDB. Any modification to the training plan must remain consistent with the occupational skill requirements and the approved OJT contract. All documentation related to the OJT contract, training plan, evaluations, and reimbursement must be included in the participant's program file.

On-the-Job Training opportunities may be provided to eligible Youth participants as a form of paid work experience when appropriate and consistent with Workforce Innovation and Opportunity Act (WIOA) Youth program requirements. OJT for participants under the age of 18 requires WDB management approval. When providing OJT to participants under the age of 18, the WDB and participating employers must ensure compliance with applicable federal, state, and local labor laws governing the employment of minors. It is the intent of the WDB to use OJT contracts for positions that pay at or above the self-sufficiency standard.

### **CONTRACT ASSURANCES**

In the contractual language, the employer must comply with the following standards:

1. Participants/trainees shall be compensated at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates must be in accordance with applicable law, but may not be less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the applicable State or local minimum wage law.

2. Participants/trainees shall be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
3. Health and safety standards established under Federal and State law otherwise applicable to working conditions of employees are equally applicable to working conditions of participants/trainees engaged in the OJT.
4. Workers' compensation insurance must be provided to participants/trainees engaged in the OJT on the same basis as the compensation is provided to other individuals in the State in similar employment.
5. The employer is in compliance with applicable Federal and State laws pertaining to nondiscrimination and equal opportunity.
6. The employer is not experiencing abnormal labor conditions such as strikes, lockouts, or layoffs.
7. The OJT participant/trainee will not displace (including partial displacement, such as reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee at the date of participation.
8. The OJT participant/trainee will not be employed in or assigned to a job as a result of a layoff from the same or any substantially equivalent job; a result of termination of the employment of any regular, unsubsidized employee; or that in any way infringes on the promotional opportunities of currently employed workers at the date of participation.
9. The employer or immediate supervisor is not providing OJT training to a member of his/her immediate family (defined as: wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, grandparent or grandchild).
10. No funds provided to employers for OJT are used to employ the participant/trainee in a position involving political activities.
11. No funds provided to employers for OJT are used to directly or indirectly assist, promote or deter union organizing.
12. No funds provided to employers for OJT are used in the employment or training of participants/trainees involved in the construction, operation, or maintenance of that part of a facility which is used for religious instruction or worship (sectarian activities).
13. The OJT is not impairing existing contracts for services or collective bargaining agreements. If an OJT activity would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the OJT begins.

## **DISCLAIMER**

This policy is based on WDB's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal or state guidance.

## **REFERENCES**

**Law**

- Workforce Innovation and Opportunity Act (WIOA) of 2014

**Federal Guidance**

- Workforce Innovation and Opportunity Act (WIOA) Final Rule: 20 CFR Part 680 – Adult and Dislocated Worker Activities under Title I of WIOA
- Workforce Innovation and Opportunity Act (WIOA) Final Rule: 20 CFR Part 681 – Youth Activities under Title I of WIOA
- Workforce Innovation and Opportunity Act (WIOA) Final Rule: 20 CFR Part 683 – Administrative Provisions under Title I WIOA
- WIOA Nondiscrimination and Equal Opportunity Regulations: 29 CFR Part 38
- Training and Employment Guidance Letter WIOA (TEGL) 19-16 – [Guidance on Services provided through the Adult and Dislocated Worker Programs under WIOA](#) and Wagner-Peyser Act Employment Services, as amended by WIOA
- Training and Employment Guidance Letter WIOA (TEGL) 3-15 – [Guidance on Services Provided Through the Adult and Dislocated Worker Programs Under WIOA](#)

**State Guidance**

- EDD Workforce Services Directive (WSD) 24-14 – On-the-Job Training Employer Reimbursement Waiver

**Approved by**

Workforce Development Board of Solano County



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

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EMPLOYEE ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING FOR:  
ON-THE-JOB-TRAINING POLICY  
(Issued March 20, 2026)

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The Workforce Development Board (WDB) of Solano County's On-the-Job Training Policy contains important information pertaining to my employment and duties at the WDB.

A copy of this policy has been given to me to retain for future reference, and I have been provided with the location on the Shared Drive for the policy where I can obtain an electronic copy.

Since the information and policies described in the policy are necessarily subject to change, I acknowledge that revisions to the policy may occur. All such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

I have received the On-the-Job Training Policy and I understand that it is my responsibility to read and comply with the information contained in this policy and any revisions made to it.

I understand that I should consult with my supervisor if I have any questions about the information contained in the policy. I understand that failure to comply with the information contained in the policy could lead to disciplinary action or termination.

Employee's Name (printed): \_\_\_\_\_

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## On-the-Job Training (OJT) Policy (2026-07)

### Summary of Changes and Reasons

#### Section 1 - Introduction

**Change:** Revised language to remove the reference limiting OJT reimbursement to 50 percent of participant wages

**Reason:** Clarifies that multiple reimbursement levels may be applied depending on participant characteristics, employer size, training quality, and applicable waivers, and aligns the policy with federal regulations governing OJT reimbursement flexibility (WIOA Section 134(c)(3)(H); 20 CFR 680.700–680.730).

#### Section 4 - Policy

**Change:** Removed the reimbursement to 50 percent reference

**Reason:** see Section 1 reason

#### Section 5 - OJT Eligibility

**Change:** Clarified eligibility language to explicitly include WIOA Youth participants.

**Reason:** Ensures the policy reflects that OJT opportunities may be provided to eligible Youth participants as a form of paid work experience consistent with WIOA youth program requirements (WIOA Section 129(c)(2); 20 CFR Part 681).

**Change:** Clarified eligibility criteria for employed workers and identified that the WDB determines the self-sufficiency standard used to determine eligibility.

**Reason:** Aligns the policy with WIOA program eligibility requirements and clarifies the role of the local Workforce Development Board in establishing local self-sufficiency standards used in determining eligibility for training services (WIOA Section 134(c)(3); 20 CFR Part 680).

#### Section 6 - Contract Parameters

**Change:** Revised language related to skills gap assessments and clarified that O\*NET job zones and Specific Vocational Preparation (SVP) levels *may* be used as reference tools when determining the appropriate length of an OJT contract.

**Reason:** Ensures that OJT duration is based on the participant's assessed skill needs and the occupational skill requirements of the job while allowing flexibility in selecting appropriate labor market and occupational reference tools (20 CFR 680.700; TEGL 19-16).

**Change:** Clarified the allowable reimbursement levels of 50 percent, 75 percent, and up to 90 percent when authorized through a federal or state waiver.

**Reason:** Aligns policy language with federal OJT reimbursement provisions and current state waiver authority governing employer reimbursement levels (WIOA Section 134(c)(3)(H); 20 CFR 680.720; WSD 24-14).

**Change:** Added requirement that the reimbursement rate be established in the OJT contract prior to the start of the training period.

**Reason:** Ensures compliance with federal monitoring and documentation requirements that OJT contract terms be established and documented before training begins (20 CFR 680.730; 20 CFR Part 683).

**Change:** Updated language allowing training plans to be revised when additional training time is necessary with agreement from the employer and the WDB, provided the modification remains consistent with the approved OJT contract.

**Reason:** Clarifies the process for modifying OJT training plans when additional training is necessary while ensuring modifications remain consistent with federal OJT requirements and the approved training contract (20 CFR 680.700; TEGL 19-16).

**Change:** Added language allowing OJT opportunities for Youth participants under age 18 with WDB management approval and requiring compliance with applicable federal, state, and local labor laws governing the employment of minors.

**Reason:** Ensures appropriate oversight and compliance with federal and state labor laws when minors participate in OJT activities and aligns policy language with WIOA youth program requirements (WIOA Section 129; 20 CFR Part 681).

### **Section 7 - Contract Assurances**

**Change:** Updated nondiscrimination language to reference compliance with applicable federal and state nondiscrimination and equal opportunity laws.

**Reason:** Aligns policy language with current WIOA nondiscrimination and equal opportunity regulations (29 CFR Part 38).

### **Section 9 - References**

**Change:** Updated federal and state references to reflect current regulations and guidance governing On-the-Job Training program implementation.

**Reason:** Ensures the policy references the applicable federal statutory and regulatory framework governing OJT services, youth participation in OJT activities, administrative requirements, nondiscrimination provisions, and current state guidance used to administer WIOA programs (WIOA Sections 129, 134, and 194; 20 CFR Parts 680, 681, and 683; 29 CFR Part 38; TEGL 19-16; TEGL 3-15; WSD 24-14).



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM X.E**

**March 20, 2026**

<p><b>SUBJECT</b> Review and Approval of the Second Modification to the Fiscal Year 2026-27 Budget, as Recommended by the Budget Committee</p>	<p><b>ATTACHMENTS</b> A</p>
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**RECOMMENDATION**

Staff and the Budget Committee recommend review and approval of the second modification to the budget for the Fiscal Year 2026-27.

**DISCUSSION**

Budget Modification #2 reflects updated grant funding allocations, newly awarded grants, and adjustments resulting from internal financial reconciliations completed during the fiscal year. These updates ensure revenues and expenditures accurately reflect available funding and current program operations.

The following items represent revenue or expenditure changes exceeding ±10% compared to Budget Modification #1.

**Revenue Adjustments**

*WIOA Adult and Dislocated Worker Programs*

Revenue adjustments reflect the 14% transfer between WIOA Adult and Dislocated Worker funding streams previously approved by the Board. This transfer aligns funding with participant service demand and program needs while maintaining overall WIOA funding levels.

*New Grants*

Two new grants were awarded after approval of Budget Modification #1 and therefore appear as 100% increases:

- Anheuser-Busch / Mare Island Dry Dock Additional Assistance Grant
- Valero Closure Additional Assistance Project

These grants provide additional workforce services funding and were not included in the prior budget.

*Grant Balance Reconciliations (Lines 25, 29, 30, 31)*

Adjustments reflect updates resulting from internal grant reconciliation processes that identified revised remaining balances available for expenditure during the fiscal year. These updates ensure revenue projections accurately reflect verified grant funding levels.

*South Bay Workforce Investment Board (Line 37)*

Revenue from the South Bay WIB agreement was not fully captured in Budget Modification #1 and has now been corrected to reflect the full funding amount.

### *Local Match (SBDC)*

Adjustments to Local Match reflect updated funding considerations discussed during Executive Committee closed session and align the budget with current funding commitments.

### *Irvine Capacity Building Grant (Line 41)*

Revenue associated with the Irvine grant was increased following reconciliation of grant balances which identified additional funding available for expenditure during the fiscal year.

### *Mare Island Revenue Update*

Projected revenue was adjusted to reflect the actual amount received (\$10,000) rather than the originally estimated \$15,000.

### *Program Income (Line 47)*

Program income was not fully reflected in Budget Modification #1 and has now been updated to capture actual income generated during the fiscal year.

## **Expenditure Adjustments**

Expenditure updates reflect the allocation of newly awarded grant funds and adjustments resulting from grant reconciliation.

### *Cost Categories (Lines 70–77)*

Adjustments to these cost categories reflect:

- Allocation of expenditures related to newly awarded grants
- Reallocation of shared costs across funding sources
- Updated spending authority following reconciliation of grant balances

In some cases, reconciled grant balances allowed for increased allowable expenditures within specific cost categories. For example, additional Irvine grant funding enabled increased investment in Employee Professional Development.

## **Result**

These adjustments ensure the budget accurately reflects current funding levels, grant awards, and allowable expenditures while maintaining compliance with grant requirements and organizational cost allocation practices.

## **REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Lauren Bender at 707-863-3548 if you have any questions regarding the information outlined in this report.

WDB SOLANO

FY2025-26 Budget MOD #2

To be presented to the Board of Directors 3/2026

	<u>Expires</u>	BUDGET 2025-26 Mod #1	2025-26 To Date as of 01.31.26	FY25-26 % Spent vs Planned	BUDGET 2025-26 Mod #2	\$ Increase / Decrease	% Increase / Decrease
<b>REVENUE:</b>							
<b>State Grant Revenue</b>							
WIOA Adult		\$1,401,938	\$753,028	54%	\$1,212,197	(\$189,741)	-14%
WIOA Dislocated Worker		\$1,349,601	\$709,669	53%	\$1,539,342	\$189,741	14%
WIOA Youth		\$1,500,338	\$728,007	49%	\$1,364,377	(\$135,961)	-9%
WIOA Rapid Response		\$136,324	\$67,272	49%	\$136,324	\$0	0%
WIOA Layoff Aversion		\$61,175	\$22,829	37%	\$61,175	\$0	0%
EDD - DOR-AJCC Collaboration Project (Disability Grant)	4/30/2027	\$268,138	\$91,736	34%	\$268,138	\$0	0%
Anheuser-Busch / Mare Island Dry Dock	6/30/2027	\$0	\$0	0%	\$410,000	\$410,000	100%
Valero Closure AA Project	6/30/2026	\$0	\$0	0%	\$375,000	\$375,000	100%
<b>State Grant Revenue Total</b>		<b>\$4,717,514</b>	<b>\$2,372,540</b>	<b>50%</b>	<b>\$5,366,553</b>	<b>\$649,039</b>	<b>14%</b>
<b>Other Government Grants/Contracts</b>							
City of San Francisco - CA Jobs First Fiscal Agent	9/20/2026	\$64,000	\$2,667	0%	\$64,000	\$0	0%
County of Solano - ARPA 2: Community Workforce	12/31/2025	\$69,210	\$33,088	0%	\$69,256	\$46	0%
County of Solano - ARPA 3: Industry Training	6/30/2026	\$181,051	\$80,038	0%	\$180,794	(\$257)	0%
County of Solano - ARPA 4: Community Engagement	6/30/2026	\$408,327	\$63,874	16%	\$227,408	(\$180,919)	-44%
CWDB - HIRE Reentry Grant	3/27/2027	\$477,254	\$1,163,861	244%	\$1,443,574	\$966,320	202%
CWDB - Prison to Employment 2.0	12/31/2026	\$182,877	\$188,172	103%	\$434,306	\$251,429	137%
CWDB - Regional Equity	12/31/2026	\$497,580	\$670,109	135%	\$1,150,000	\$652,420	131%
NorCal SBDC - Capital Improvement Program		\$115,000	\$50,427	44%	\$115,000	\$0	0%
NorCal SBDC - Small Business Administration		\$165,374	\$20,503	12%	\$165,374	\$0	0%
NorCal SBDC - Technical Assistance Program		\$93,479	\$13,244	14%	\$93,479	\$0	0%
SBDC Local Match		\$69,800	\$0	0%	\$0	(\$69,800)	-100%
South Bay WIB - Apprenticeships	3/31/2026	\$0	\$8,922	0%	\$7,223	\$7,223	100%
<b>Other Government Revenue Total</b>		<b>\$2,323,951</b>	<b>\$2,294,905</b>	<b>99%</b>	<b>\$3,950,414</b>	<b>\$1,626,463</b>	<b>70%</b>
<b>Other Revenue</b>							
Irvine Capacity Building (plus flex fund)	11/2/2026	\$156,610	\$374,061	239%	\$212,825	\$56,215	36%
Mare Island		\$15,000	\$0	0%	\$10,000	(\$5,000)	-33%
Napa Accelerator		\$0	\$0	0%	\$7,500	\$7,500	100%
Fee for Service		\$9,750	\$0	0%	\$9,750	\$0	0%
Program Income (SBDC Income & Contributions)		\$0	\$0	0%	\$21,943	\$21,943	100%
<b>Other Revenue Total</b>		<b>\$181,360</b>	<b>\$374,061</b>	<b>206%</b>	<b>\$262,018</b>	<b>\$80,658</b>	<b>44%</b>
<b>Donations and Contributions</b>							
Donations and Sponsorships		\$26,943	\$20,000	0%	\$30,000	\$3,057	11%
<b>Donations and Contributions Total</b>		<b>\$26,943</b>	<b>\$20,000</b>	<b>0%</b>	<b>\$30,000</b>	<b>\$3,057</b>	<b>11%</b>
<b>TOTAL REVENUE</b>		<b>\$7,249,768</b>	<b>\$5,061,506</b>	<b>121%</b>	<b>\$9,608,985</b>	<b>\$2,359,216</b>	<b>33%</b>

	<a href="#">Expires</a>	BUDGET 2025-26 Mod #1	2025-26 To Date as of 01.31.26	FY25-26 % Spent vs Planned	BUDGET 2025-26 Mod #2	\$ Increase / Decrease	% Increase / Decrease
<b>EXPENSES:</b>							
Salaries and Benefits		\$3,386,686	\$1,828,187	54%	\$3,444,758	\$58,072	2%
<b>Personnel Expenses</b>		<b>\$3,386,686</b>	<b>\$1,828,187</b>	54%	<b>\$3,444,758</b>	<b>\$58,072</b>	<b>2%</b>
Vocational Training		\$626,187	\$177,300	28%	\$834,792	\$208,605	33%
Work-Based Training		\$44,500	\$86,090	193%	\$192,500	\$148,000	333%
Supportive Services		\$41,841	\$8,281	20%	\$136,313	\$94,472	226%
Business Advisors		\$201,008	\$58,576	29%	\$214,347	\$13,340	7%
Small Business Grants / Payments		\$0	\$0	0%	\$180,000	\$180,000	0%
Outreach		\$9,691	\$35,557	367%	\$100,491	\$90,800	937%
Program Contracts		\$1,841,029	\$2,243,151	122%	\$3,385,719	\$1,544,690	84%
<b>Direct Program Costs</b>		<b>\$2,764,255</b>	<b>\$2,608,955</b>	94%	<b>\$5,044,162</b>	<b>\$2,279,907</b>	<b>82%</b>
Communications / IT		\$92,821	\$60,568	65%	\$108,983	\$16,162	17%
Employee / WDB Professional Development		\$18,000	\$77,046	428%	\$83,137	\$65,137	362%
Facilities		\$546,474	\$339,320	62%	\$555,361	\$8,887	2%
Memberships		\$16,453	\$12,500	76%	\$17,721	\$1,268	8%
Mileage / Travel		\$37,415	\$6,167	16%	\$14,478	(\$22,937)	-61%
Supplies / Equipment		\$5,463	\$14,962	274%	\$19,794	\$14,331	262%
Software		\$52,004	\$15,278	29%	\$105,802	\$53,798	103%
Other Operating Costs		\$330,198	\$98,228	30%	\$214,789	(\$115,409)	-35%
<b>Other Costs</b>		<b>\$1,098,828</b>	<b>\$624,069</b>	57%	<b>\$1,120,064</b>	<b>\$21,237</b>	<b>2%</b>
<b>TOTAL EXPENSES</b>		<b>\$7,249,769</b>	<b>\$5,061,210</b>	124%	<b>\$9,608,984</b>	<b>\$2,359,216</b>	<b>33%</b>

Revenue Over / (Under) Expenses

\$0
\$296
\$0



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

**AGENDA ACTION ITEM X.F**  
**March 20, 2026**

<b>SUBJECT</b>	<b>ATTACHMENTS</b>
Review and Approval of the Contract with the Student Conservation Association, Inc. for Career Ready Youth Work Experience, Not to Exceed \$120,000, Funded by the Workforce Innovation and Opportunity Act (WIOA); Give Executive Director authority to finalize and execute the contract, and make administrative changes, as needed	A

**RECOMMENDATION**

Staff recommend approval of the contract with Student Conservation Association (SCA) to provide Career Ready Youth Work Experience services for the period of April 15, 2026, through August 31, 2026, not to exceed \$120,000. This contract will be funded under the Workforce Innovation and Opportunity Act (WIOA) Youth program.

It is further recommended that the Board authorize the Executive Director, or designee, with the concurrence of County Counsel and approval of the Board of Supervisors, to execute this contract and any subsequent amendments which are technical or administrative in nature and have no fiscal impact. In accordance with the Workforce Development Board’s current Memorandum of Understanding with the County, contracts with an annual amount in excess of \$75,000, it must be reviewed and approved by the Solano County Board of Supervisors.

As part of this agenda item, Attachment A includes the Cover Page, Scope of Work (Exhibit A), and Budget (Exhibit B). The contract General Terms and Conditions (Exhibit C) and WIOA Special Terms and Conditions (Exhibit D) remain the standard exhibits and therefore are not included in the attachment.

**DISCUSSION**

The WDB will again offer the Summer Youth Work Experience Program to provide eligible in-school youth with hands-on experience. Through the program, participants gain exposure to outdoor conservation work, workforce readiness activities, and career exploration connected to environmental and sustainability-related fields.

The program is structured as a paid work experience opportunity. Participants will earn \$18.10 per hour and work approximately 28 hours per week, combining field-based project work with workshops and activities focused on career awareness and workplace skills.

During the WDB’s small purchase procurement process, two quotes were received, with the Student Conservation Association’s quote providing the most robust and well-rounded program to support supervised conservation field work, workforce readiness training, and career exploration opportunities connected to climate transition and environmental careers.

SCA is a nonprofit organization that specializes in youth conservation service and environmental workforce development programs and serves as the employer of record for program participants. SCA has provided youth summer work experience program services for the WDB since 2023.

**ALTERNATIVES**

While not recommended, the Board could direct staff to obtain additional quotes for the summer youth work experience program, however, the services provided by the SCA continues to meet staff's expectations.

**AGENCY BUDGET IMPACT**

The WDB's FY2025-26 and FY2026-27 budget will include the necessary funding to cover the cost of this contract through WIOA youth funding.

**REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Tammy Gallentine at 707-863-3552 if you have any questions regarding the information outlined in this report.



**WORKFORCE DEVELOPMENT BOARD**  
OF SOLANO COUNTY

**STANDARD AGREEMENT**  
**CONTRACT NO. PY-26-004**

1. This Contract is entered into between the Workforce Development Board (WDB) of Solano County and The Student Conservation Association Inc. (“Contractor”) for Workforce Innovation and Opportunity Act (WIOA) for Xplore Solano Summer Youth Work Experience Program.

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2. The term of this Contract is: April 15, 2026 through August 31, 2026

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3. The Maximum amount of this contract is: \$120,000

The parties agree to comply with the terms and conditions of the following exhibits which are by this reference made a part of this Contract:

- Exhibit A – Scope of Work
- Exhibit B – Budget Detail and Payment Provisions
- Exhibit C – General Terms and Conditions
- Exhibit D – Special Terms and Conditions

Workforce Development Board of Solano County

BY: \_\_\_\_\_  
Authorized Signature

NAME: David A. Hubble

TITLE: President/Executive Director

DATE: \_\_\_\_\_

ADDRESS: 500 Chadbourne Road, Suite A  
Fairfield, CA 94534

APPROVED AS TO FORM

\_\_\_\_\_  
Solano County Counsel Signature

Student Conservation Association, Inc.

BY: \_\_\_\_\_  
Authorized Signature

NAME: Matt Gray

TITLE: Sr. VP of Programs

DATE: \_\_\_\_\_

ADDRESS: 1310 N. Courthouse Road, Suite 110  
Arlington, VA 22201

COUNTY OF SOLANO

BY: \_\_\_\_\_  
Authorized Signature

NAME: Ian M. Goldberg

TITLE: County Administrator

DATE: \_\_\_\_\_

ADDRESS: 675 Texas Street, Suite 6500  
Fairfield, CA 94533

## **EXHIBIT A SCOPE OF WORK**

### **I. SERVICE DELIVERY**

#### **A. GENERAL EXPECTATIONS OF THE CONTRACTOR**

1. Provide an engaging, five-week work experience for up to ten (10) targeted Solano County young adults.
2. Follow Workforce Innovation and Opportunity Act (WIOA) and Workforce Development Board (WDB) of Solano County’s programmatic and administrative guidelines.
3. Leverage community resources and collaborative community partnerships to support young adults participating in services.
4. Document and communicate project progress in a reliable, professional, and responsible manner.

#### **B. SERVICE ACTIVITIES**

Contractor will provide the service activities as outlined below to accomplish the goal of the Xplore Solano Summer Youth Work Experience Program 2026:

1. ***Outreach and Participant Screening*** – Contractor will partner with the WDB to perform outreach and screening of potential participants. Participants will be WIOA-eligible youth who have just completed their junior or senior year in high school. The WDB will make the final eligibility determination per WIOA Youth guidelines.
2. ***Work Experience Supervision*** – Contractor will deliver a five-week work experience for up to 10 youth performing duties at various work sites in Solano County related to topics such as water availability and usage, agricultural practices, and land management. Participants will be supervised at work sites from Monday to Thursday from 9:00 a.m. to 4:00 p.m., with a one-hour lunch from 12:00pm to 1:00pm. On Fridays, youth will attend workshops from 9:00 a.m. to 1:00 p.m. for a total of 28 hours per week.

The duration of the work experience will be five weeks starting and ending on a mutually agreed upon date determined by WDB and Contractor, to be completed no later than August 31, 2026

Supervision of ten (10) youth will be conducted by two (2) Contractor-selected supervisors.

3. ***Employer of Record Services*** – Contractor will serve as the employer of record for up to twelve (10) youth participants for five (5) weeks with wages of \$18.10 per hour. Employer of record services will include HR onboarding of employees, management of mandated fringe benefits, workers’ compensation, and tracking and implementation of applicable California HR timelines and regulations.
4. ***Safety and Equipment Training*** – Contractor will provide training to participants prior to related worksite activities on the use of tools and personal protective equipment. Contractor will provide on-site risk management to help reduce, train, and respond to safety issues in the field. Training must include First Aid and CPR.

5. ***Work-Site and Workshop Assistance*** – Contractor will partner with the WDB to select worksites, deliver workshops highlighting opportunities in careers related to the work experience conducted, vocational development, and connection to community.
6. ***Barrier Reduction Services*** – Contractor will provide transportation for participants to and from the selected worksites and workshop locations to reduce the barrier of transportation. Contractor will provide tools, appropriate apparel, and safety equipment for working in all-weather outdoor conditions.
7. Contractor will support collection of registration, completion, credential, and other performance data documentation per agreed-upon guidelines.

## **II. CONTRACTOR RESPONSIBILITIES**

### **A. AVAILABILITY TO PERFORM SERVICES**

#### 1. Contractor will:

- a. Deliver program services in accordance with the negotiated scope of work and budget;
- b. Provide and train qualified staff to plan and administer the contracted services;
- c. Provide program sustainability for duration of the Contract;
- d. Provide internal monitoring and oversight of program activities and requirements;
- e. Guarantee that all program services provided are readily accessible to eligible individuals and meet Americans with Disabilities Act (ADA) and Equal Opportunity requirements; and
- f. Provide services that adhere to all applicable policies and procedures promulgated by the WDB, the County of Solano, and the Department of Labor relating to contractor duties and responsibilities pursuant to the terms and conditions of this Contract.

### **B. HOURS OF OPERATIONS**

Contractor shall offer its services on a provided schedule from Monday through Friday or based on the need and availability of the targeted population to be served.

### **C. CONTRACTOR'S RESOURCES**

Contractor will implement and coordinate services and provide all necessary instructions, supervision, and supplies for program activities. Contractor shall maintain sufficient resources, including computer technology, to deliver the services and perform necessary administrative functions throughout the term of this contract.

### **D. CONFIDENTIALITY**

All correspondence, communication and reporting mechanisms will adhere to WDB policies to safeguard the client's confidentiality. No information that would personally identify the individual may be included in email correspondence. See *WDB's Use and Confidentiality of Participant Personally Identifiable Information (PII) Policy* for further details.

**E. COMMUNICATION AND MATERIALS**

The Contractor will maintain regular communication with WDB staff. As part of this communication, the Contractor must inform the WDB of any special events under the WIOA umbrella of services prior to implementation.

Any documents connected with the contract and that use Contractor funds from the WDB must include the WDB name as the overarching brand for WIOA services in Solano County. In addition, appropriate accessibility and accommodations, as well as Steven’s Amendment acknowledgement language, must be included on any collateral used.

Any official WIOA forms utilized by the Contractor must be shared and approved in writing by the WDB.

**F. DOCUMENTATION AND RECORDS**

The WDB shall have full and free access to any project documents and records at all times during normal business hours, including the right to inspect, copy, audit, and make records from such records. Such records shall be maintained for a period of three (3) years following completion of the services hereunder, and the WDB shall have access to such records in the event an audit is required.

All reports, records, documents, and other materials prepared by the Contractor in the performance of this contract shall be the property of the WDB and shall be delivered upon request of the WDB. Contractor shall have no claim for further employment or additional compensation as a result of the exercise by the WDB of its full rights of ownership of the documents and materials hereunder. Contractor may retain copies of such documents for its own use and shall have an unrestricted right to use the concepts embodied therein.

**G. REPORTING REQUIREMENTS**

Contractor shall work with the WDB to support any participant or project reporting requirements for services provided to participants as part of this Contract. All services being offered to participants will be entered into CalJOBS by WDB staff and reviewed on a regular basis. The Contractor will provide project updates and reports in a format and timeline mutually agreed upon by the WDB and Contractor.

**H. OUTCOMES**

Contractor will provide five (5) weeks of work experience services for up to 10 clients to be completed by August 31, 2026.

**III. WDB RESPONSIBILITIES**

The WDB staff will be responsible for the following:

1. Provide project enrollment, case management, data entry, documentation maintenance, and outcome tracking for participants entering project activities;
2. Evaluate and monitor the management and operations of all programs funded by the WDB, including:
  - Conducting ADA, equal opportunity, and accessibility compliance reviews per WIOA law and the WDB’s *Federal Monitoring and Compliance Oversight Policy*;

- Periodic review of accurate expenditures against cost categories and within cost limitations specified in WIOA regulations;
  - Periodic review of programmatic delivery and documentation compliance.
3. Provide technical assistance to Contractor staff in the areas of WIOA compliance;
  4. Inform Contractor of Federal, State, and local policies and procedures that may impact the operations of the program, and give guidance as needed to implement them accordingly;
  5. Ensure compliance with all rules, regulations, and policies issued under WIOA; and
  6. Process payments for services.

The roles and responsibilities of the WDB and Contractor may be refined and changed due to changes in Federal, State or Local law, regulations, or policies relating to WIOA upon written notification and in accordance with section 13 and 26 in Exhibit C.

**EXHIBIT B  
 BUDGET DETAIL AND PAYMENT PROVISIONS**

<b>BUDGET SUMMARY (Cost Categories)</b>	<b>TOTAL</b>
<b>PERSONNEL (Includes Salary + Benefits)</b>	
Onsite Supervisor Salary and Benefits	\$16,830.00
<b>SUBTOTAL PERSONNEL:</b>	<b>\$16,830.00</b>
<b>PARTICIPANT COSTS</b>	
Participant Wages	\$25,480.00
Participant Fringe Benefits and Workers’ Comp	\$5,826.71
Participant Equipment and Supplies	\$2,300.00
Participant Onboarding and Training	\$2,000.00
Participant Transportation Costs	\$5,300.00
<b>SUBTOTAL TRAINING COSTS:</b>	<b>\$40,906.71</b>
<b>PROGRAM OPERATING COSTS</b>	
Cell Phone Reimbursement	\$270.00
Supervisor Expenses – (i.e.: participant and supervisor recruiting costs, supervisor equipment, supervisor travel, onsite risk management, evaluation)	\$6,495.00
Program Support	\$31,840.00
<b>SUBTOTAL OPERATING COSTS:</b>	<b>\$38,605.00</b>
<b>ADMINISTRATIVE COSTS</b>	
Administrative Costs (29.88%)	<b>\$28,786.90</b>
Cash Match	<b>(\$5,128.61)</b>
<b>CONTRACT TOTALS:</b>	<b>\$120,000.00</b>

1. The WDB agrees to pay the Contractor for services upon the presentation of an appropriate invoice and documents supporting the deliverables as defined in the Scope of Work to be performed. The Contractor shall submit monthly invoices detailing work performed for each deliverable detailed in the Scope of Work (Exhibit A) and amount payable to the WDB’s Executive Director/President, or designee. Monthly invoices for payment should be submitted to the WDB by the 30<sup>th</sup> day of the subsequent month. The payment shall be made only after the services required under this contract have been performed to the satisfaction of the Executive Director/President or designee, and the deliverables described in Exhibit A, Scope of Work have been accepted in writing by the Executive Director/President or his/her designee.
2. Contractor must request approval for transfers between budget line items, which are set forth in Exhibit B (Budget Summary) when the cumulative amount of such transfers exceed 10% of the budget cost category total amount. Requests for transfers between budget line items must be presented to the WDB in writing, which approval may be withheld in the sole and absolute discretion of WDB. WDB may authorize the addition of budget line items for transfers under this section, provided that the line item added does not substantially change the scope of services to be provided under this Contract and does not increase the total contract amount.

3. Contractor shall provide any additional documentation as required by WDB at any time in order to substantiate Contractor's claims for payment. WDB may elect to withhold payment for failure by Contractor to provide such documentation required by WDB.
4. Contractor must maintain backup documentation onsite that supports the financial data submitted to the WDB. Contractor shall make this backup documentation available upon request of the WDB.
5. Allowable operating expenses are defined as necessary expenditures exclusive of personnel salaries, benefits, equipment, or payments to subcontractors. Such expenses include specific items directly charged to the project. The expenses must be grant-related (i.e., to further the program objectives as defined in the grant award) and be incurred (realized) during the contract period. County reserves the right to make the final determination if an operating expense is allowable and necessary.
6. The maximum payment under the terms of this contract shall under no circumstances, exceed **\$120,000** for the related expenses unless this contract is modified in accordance with Section 26 in Exhibit C.



**WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

**AGENDA ACTION ITEM X.F**

**March 20, 2026**

<b>SUBJECT</b> Approval to Authorize the Executive Director to Make Administrative Changes to Internal Policies, as Needed	<b>ATTACHMENTS</b> NONE
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**RECOMMENDATION**

Staff recommend that the Board of Directors authorize the Executive Director to approve administrative, non-substantive changes to policies, while maintaining existing approval requirements for all substantive policy revisions.

**DISCUSSION**

From time to time, administrative updates to policies are necessary to ensure accuracy and consistency across documents. These updates may include changes to contact information, internal references to other policies or procedures, and minor revisions that do not alter the intent or substance of the policy. Currently, all policy updates, regardless of significance, require formal review and approval. Providing the Executive Director with the authority to approve administrative changes will allow staff to maintain accurate and up-to-date policies in a more timely and efficient manner.

Any revisions that impact policy intent, are driven by new or updated federal, state, or local guidance, or result in substantive programmatic changes will continue to follow the established review and approval process through the appropriate committee and/or Board of Directors.

**REPORT PREPARED BY**

Tammy Gallentine/Executive Operations Manager. Please contact Tammy Gallentine at 707-863-3552 if you have any questions regarding the information outlined in this report.



## **WORKFORCE DEVELOPMENT BOARD**

OF SOLANO COUNTY

### **Current Committee Members**

#### **Standing Committees**

##### **Executive – meets bi-annually**

Chris Churchill (Chair)	Heather Henry (Treasurer)
Shannon Stack (Vice-Chair)	Glenn Loveall (Member-At-Large)
Chris Huxsoll (Secretary)	Megan Richards (non-Board Member)

##### **Planning & Oversight - meets 3<sup>rd</sup> Friday (non- Board months), 9:30 – 11:30 a.m.**

Chris Huxsoll (Chair)	Chris Churchill
Suzanne Castano	Shannon Stack
Janice Fera	Glenn Loveall
David Tam	Dr. Rhuenette Alums (non-Board Member)

##### **Budget - meets quarterly**

Heather Henry (Chair)	Chris Churchill
Shannon Stack	Tim Healer
Chris Rico	Megan Richards (non-Board Member)

#### **Ad-Hoc Committees**

##### **Human Resources – meets as needed**

Shannon Stack (Chair)	Idowu Koyejo
Chris Churchill	David Tam

##### **Equity Committee – meets as needed**

Chris Churchill	Coco House
Deanna Hurn	Glenn Loveall
Chris Rico	David Tam

##### **Marketing Committee – meets as needed**

Chris Churchill (Chair)	Idowu Koyejo
Chris Rico	

# BOARD OF DIRECTORS

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President,  
Advance Marketing  
Business Representative

### **Shannon Stack, Vice Chair**

VP of Operations,  
Paradise Valley Estates  
Business Representative

### **Chris Huxsoll, Secretary**

Senior VP of Operations,  
Polaris Pharmaceuticals, Inc.  
Business Representative

### **Heather Henry, Treasurer**

Chief Executive Officer,  
California Human Development  
Community Workforce Representative

## MEMBER-AT-LARGE

### **Glenn Loveall**

Executive Director,  
Napa-Solano Central Labor Council  
Labor Representative

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### **Dr. Kellie Butler**

Superintendent-President  
Solano Community College  
Education Representative

### **Suzanne Castano**

Team Manager,  
CA State Department of Rehabilitation  
Vocational Rehabilitation Representative

### **Kelli Courson**

Owner,  
Express Employment Professionals  
Business Representative

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Director, Solano County Health & Social Services  
Welfare-to-Work/Food Stamps/TANF  
Community Development Representative

### **Mark DeWeerd**

Consultant, Center for Organizing & Bargaining,  
California Teachers Association  
Labor Representative

### **Mary Dugbartey**

Director, Talent & Organizational Development,  
NorthBay Healthcare Foundation  
Business Representative

### **Janice Fera**

Consortium Manager,  
Solano Adult Education Consortium  
Education Representative

### **Henry Funcke**

Outreach and Rotation Training Coordinator,  
Sheet Metal Workers Local 104 &  
Bay Area Industry Training Fund  
Apprenticeship Program Representative

### **Tim Healer**

Vice Business Banking Officer  
Bank of Stockton, Dixon Branch  
Business Representative

### **Coco House**

Director,  
Solano County Farm Bureau  
Business Representative

### **Deanna Hurn**

Founder/CEO,  
Miracle Math Coaching  
Business Representative

### **Catherine Johnson**

SVP/Chief People Officer,  
Travis Credit Union  
Business Representative

### **Idowu Koyejo**

Owner,  
Teme Salon LLC  
Business Representative

### **Summer Miguel**

Human Resources Manager,  
Six Flags Discovery Kingdom  
Business Representative

### **Alicia Mijares**

Business Representative,  
Sheet Metal Workers Local 104  
Labor Representative

### **Jamie Powell**

Program Director,  
Fighting Back Partnership  
Community Workforce Representative

### **Chris Rico**

President/CEO,  
Solano Economic Development Center  
Economic Development Representative

### **David Tam**

Cluster Manager – EPM III,  
Employment Development Department  
Wagner-Peyser Representative

