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# **Services for Adults and Dislocated Workers**

#### **PURPOSE:**

The purpose of this policy is to describe and define the required and permitted services for adults and dislocated workers in the Southeast Arkansas Workforce Development Board (SEAWDB) area in accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA), the WIOA Final Rule, Training and Employment Guidance Letters (TEGLs) published by the Employment and Training Administration of the U.S. Department of Labor (ETA), and policies of the Arkansas Workforce Development Board (AWDB) and to detail eligibility requirements for receiving these services in accordance with the same law, regulations, and policies.

#### **REFERENCE:**

WIOA §§ 3, 122(h); 129(b)(2)(D), & 134

20 CFR 678.430

20 CFR 680

20 CFR 683.500 - 683.530

20 U.S.C. 1001 & 1002(a)(1)

Comments in WIOA Final Rule concerning §680.150

20 U.S.C. 796 et seq. (Title VII of the Rehabilitation Act of 1973)

42 U.S.C. 651 et seq. (Title IV of the Social Security Act)

TEGLs 16-16 & 19-16

A.C.A. § 15-4-3711(a)(8) (codified from Arkansas Act 907 of 2015, the Arkansas Workforce Innovation and Opportunity Act)

ADWS Policy No. WIOA I-B - 1.2 (Definitions)

ADWS Policy No. WIOA I-B - 2.3 (Eligibility for Adult Program)

ADWS Policy No. WIOA I-B - 2.4 (Eligibility for Dislocated Worker Program)

ADWS Policy No. WIOA I-B - 3.3 (Occupational Skills Training)

ADWS Policy No. WIOA I-B - 3.4 (On-the-job Training)

ADWS Policy No. WIOA I-B – 3.5 (Registered Apprenticeships)

ADWS Policy No. WIOA I-B - 3.6 (Incumbent Worker Training)

ADWS Policy No. WIOA I-B - 3.7 (Customized Training)

ADWS Policy No. WIOA I-B - 3.8 (Work Experience)

ADWS Policy No. WIOA-I-B - 3.9 (Supportive Services)

#### **POLICY:**

Adult and Dislocated Worker services consist of two types: career services and training services, both of which must be provided through the American Job Center network, although they may also be available at other locations and through other entities [20 CFR 680.100 & 680.140(a)]. Career services consist of three types: basic services, individualized services, and follow-up services [20 CFR 678.430; TEGL 19-16].

An individual becomes a participant in a particular program when the registered person is declared eligible for that program, and then receives his or her first service, other than self-service or information-only [20 CFR 680.110]. Eligibility requirements for the Adult program are found in ADWS Policy No. WIOA I-B –2.3 (Eligibility for Adult Program). Eligibility requirements for the Dislocated Worker program are found in ADWS Policy No. WIOA I-B – 2.4 (Eligibility for Dislocated Worker Program). Some services require additional eligibility determination, as explained in this policy [20 CFR 140(a)].

Availability of services is based on eligible funding of local areas. Nothing in this policy implies that an adult or dislocated worker is guaranteed receipt of specific individualized career services or training services. The individual must demonstrate need for such services before receiving them [TEGL 19-16].

# **Required Activities**

## **Basic Career Services**

Basic career services are universally accessible and must be made available to all individuals seeking employment and training services. All basic services must be available in at least one comprehensive American Job Center per local area, but the individual may receive only those services appropriate to his or her situation. There is no correct order of services, and basic services may be given after individualized or training services or in combination with such services. Basic services must be provided by Employment Service staff in coordination with other Arkansas Workforce Center partners, including Adult and Dislocated Worker programs. Some of these services trigger participation, so they should be provided by WIOA Title I-B staff only to participants who have met eligibility requirements. The basic services requiring participation are listed at the end of the full list [WIOA § 134(c)(3)(A); WIOA §134(c)(2)(C); 20 CFR 678.430(a); 20 CFR 680.100(b)(1); TEGL 16-16; TEGL 19-16].

Basic services are [WIOA §134(c)(2)(A)(i-xi); 20 CFR 678.430(a)]:

- 1. Determination of whether the individual is eligible to receive WIOA Title I-B Adult, Dislocated Worker, and/or Youth services
- Outreach, intake (including identification through the state's Worker Profiling and Reemployment Services system of unemployment insurance (UI) claimants likely to exhaust benefits), and orientation to information and other services available through the American Job Center network
- 3. Initial assessment of skill levels, including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps) and supportive services needs
- 4. Labor exchange services, including:
  - a. Job search, placement assistance, and, in appropriate cases, career counseling
  - b. Information concerning in-demand industry sectors and occupation
  - c. Information about nontraditional employment
  - d. Recruitment on behalf of employers
- 5. Referrals to and coordination of activities with other programs and services, including American Job Center partners and other programs and services, as appropriate

- 6. Accurate workforce and labor market employment statistics information relating to local, regional, state, and national labor market areas, including:
  - a. Job vacancy listings in labor market areas
  - b. Information about job skills necessary to obtain vacant jobs listed
  - c. Information concerning local in-demand occupations, as well as the wages, skill requirements, and opportunities for advancement for those occupations.
- 7. Performance information and program costs of eligible training providers, provided by program and type of providers
- 8. Easy-to-understand information concerning local performance measures
- 9. Easy-to-understand information about supportive services and assistance, including, but not limited to, child care, child support, medical or child health assistance, SNAP, earned income tax credit, TANF programs (including TEA, Work Pays, and the Career Pathways Initiative, as appropriate), HUD housing counseling and assistance, and any other available program of supportive services and transportation
- 10. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA
- 11. Information and assistance in filing claims for unemployment compensation

Several basic services trigger inclusion in program participation, so applicants must be determined eligible for the WIOA Title I-B Adult or Dislocated Worker program before receiving any of the following services from WIOA Title I-B staff [TEGL 19-16 (Appendix II)]:

- Initial assessment of skill levels and supportive service needs
- Staff-assisted job search
- Staff-assisted referral to employment and placement assistance
- Staff-assisted career guidance and counseling
- Meaningful assistance in filing for unemployment insurance
- Assistance in establishing eligibility for financial aid

#### Individualized Career Services

For the purposes of WIOA Title I-B, individualized career services may be given only to individuals who are eligible for Adult and/or Dislocated Workers program(s) and are determined to need such services in order to obtain or retain employment [20 CFR 678.430(b); 20 CFR 680.110; TEGL 19-16]. Program eligibility requirements are given in ADWS Policies No. WIOA I-B – 2.3 (Eligibility for Adult Program) and WIOA I-B – 2.4 (Eligibility for Dislocated Worker Program). Eligibility requirements to receive particular services is included in this policy. All required activities and services must be available, but the provision of individualized services must be based on the employment needs of the individual as determined jointly by the individual and the case manager and may be identified through an individual employment plan (IEP). Eligible participants must be offered any and all individualized career services required to retain or obtain employment [TEGL 19-16].

Individualized Career Services may be provided by Employment Services staff, WIOA Title I-B staff, or by another American Job Center partner [TEGL 19-16]. There is no required order of services. A participant does not have to receive basic career services before receiving individualized career services, and he or she may receive basic services after receiving individualized services [TEGL 19-16]. As appropriate, participants should be co-enrolled with other service providers (including American Job Center partners) to create the best array of services for the participant.

Individualized Career Services <u>required to be available</u> to qualified individuals who need these services are [WIOA §134(c)(2)(A)(xii); 20 CFR 678.430(b); TEGL 19-16]:

- 1. Comprehensive and special assessments of the skill levels and service needs of the participant. The WIOA Title I-B service provider may use the assessments, interviews, and evaluations of other entities, if appropriate [WIOA § 134(c)(2)(B); WIOA § 134(c)(3)(A)(ii)]. Assessments may include:
  - a. Diagnostic testing and use of other assessment tools
  - b. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals
- Development of an individual employment plan (IEP) to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, eligible training providers
- 3. Group and/or individual counseling and mentoring
- 4. Career planning (e.g. case management)
- 5. Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training. In some instances preapprenticeship programs may be considered as short-term pre-vocational services
- 6. Internships and work experiences that are linked to careers identified in the individual employment plan [20 CFR 678.430(b)(7) & 680.170], including transitional jobs [20 CFR 680.190; TEGL 19-16, Sec. 5] (see ADWS Policy No. WIOA I-B 3.8 Work Experience). Work experiences must be available, but the type of work experience (paid or unpaid work experiences, internships, and/or transitional jobs) is at the discretion of the local area.
- 7. Workforce preparation activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in using resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training or employment
- 8. Financial literacy services, such as training for [WIOA §§ 129(b)(2)(D)]:
  - a. Creating a budget, initiating a savings plan, and making informed decisions about education, retirement, home ownership, wealth building, or other savings goals
  - b. Managing spending, credit, and debt (including credit cards)
  - c. Checking a credit report, increasing the score, and correcting any errors or problems on a report

- d. Understanding, evaluating, and comparing financial products, services, and opportunities
- e. Understanding financial situations as a non-English speaker
- 9. Out-of-area job search assistance and relocation assistance. (Such assistance does not have to be paid for by WIOA, but non-financial assistance must be available.)
- 10. English language acquisition and integrated education and training programs

#### Follow-Up Services

Follow-up services, including counseling regarding the workplace, must be made available by an American Job Center partner, for at least 12 months after the first day of employment, to participants who are placed in unsubsidized employment [WIOA § 134(c)(2)(A)(xiii); 20 CFR 678.430(c); 20 CFR 680.150(c); Comments in WIOA Final Rule concerning §680.150; TEGL 19-16].

SEAWDB has established policies concerning appropriate follow-up services for adults and dislocated workers, as well as policies for identifying when to provide such follow-up services [20 CFR 680.150(c); TEGL 19-16]. Follow-up may include other services that will help the former-participant be successful in the workplace, including counseling regarding the workplace [WIOA § 134(c)(2)(A)(xiii); TEGL 19-16], financial literacy education, mentoring, and information concerning community agencies or organizations that might assist with supportive services.

Follow-up services may not include supportive services listed in 20 CFR 680.900 [20 CFR 680.910; TEGL 19.16]. Follow-up career services are not a qualifying service for the receipt of supportive services [WIOA § 134(d)(2)(A); TEGL-19-16 . Therefore, an individual who is receiving only follow-up services may not receive supportive services [TEGL 19-16].

Arkansas uses a common exit date for participants in WIOA Title I-B and Title III core programs (WIOA Adult, Dislocated Worker, and Youth formula programs and Wagner-Peyser Employment Service program), the Trade Adjustment Assistance program (TAA), and the Title I-D National Dislocated Worker Grant program. An individual who is employed is not required to exit the Adult and Dislocated Worker programs simply because he or she is employed. If the participant is enrolled in other common-exit programs or if he or she needs additional career services (other than follow-up services, self-service, and information-only services and activities), training services, or both, the participant is not exited until these services are no longer needed. Supportive services, however, may be given only when necessary to participate in Title I-B career services or training services and only when funding is not available through other sources [TEGL 19-16].

#### **Training Services**

Training services are required to be available for eligible adults and dislocated workers who need such services, but the local areas have options concerning the types of training available to participants. Training services selected must meet the educational and career goals, as well as the abilities and skill

gaps of the participants. The need for training services must be documented in case management files [20 CFR 680.220(b)].

To receive Training Services a participant must meet <u>all</u> of the following numbered eligibility criteria:

- 1. Meet all eligibility requirements for the Adult or Dislocated Worker program. The participant also must be determined eligible in accordance with the local priority system in effect for adults if the training services are provided through the Adult formula funding stream [TEGL 19-16].
- 2. Has been determined after an interview, evaluation, or assessment, and after career planning that the individual meets <u>all</u> of the following criteria [WIOA § 134(c)(3)(A)(i)(I); 20 CFR 680.210(a) & 680.220(a); TEGL 19-16]:
  - a. Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency, as determined by the LWDB, or wages comparable to or higher than wages from previous employment, through career services alone
  - Is in need of training services to obtain or retain employment leading to economic selfsufficiency, as determined by the SEAWDB, or to wages comparable to or higher than wages from previous employment
  - c. Has the skills and qualifications to participate successfully in training services

Participants enrolled in a two-year community college or college/university degree program must hold and maintain a cumulative grade point average of a 2.0 GPA or higher on a 4.0 scale to meet this requirement. The student must have also attended a learning institution as described above within the last six months.

Participants interested in or enrolled in an apprenticeship, \*short-term training program (\*can be completed within six months), or any other related program, not meeting the criteria of a two-year community college or college/university must adhere to the following guidelines:

Where appropriate, a recent interview, evaluation, or assessment may be used for the assessment purpose [WIOA § 134(c)(2)(B); 20 CFR 680.220(a); TEGL 19-16]. Recent interview, evaluation, assessment, career planning or observations must be conducted within a time frame not to exceed three months prior to the start of occupational skills training.

The case file must contain a determination of need for occupational training services as determined through the interview, evaluation, or assessment, and career planning or any other method through which the one-stop center or partner can obtain enough information to make an eligibility determination. Staff of the SEAWDB will utilize the "Occupational Skills Justification Form" to document and justify the need for training services.

# **Examples of supporting justification may include:**

<u>Recent Interview/Observation</u>—Career Advisor is able to engage the applicant in a thorough interview, in which the applicant can articulate clear goals, understand and comprehend written and verbal questions, and think critically by responding appropriately to prompts that assess training readiness.

Evaluation/Assessment- Evidence of a prior training completed, exam passed\*, standardized

tests passed\*, or similar assessment that supports the applicant's capability of completing a training program, certificate, entrance exam, exit exam or other required exam that measures educational competencies or functioning levels. \*\*(i.e. High School Diploma, National Career Readiness Certificate, A.C.T., Accuplacer Test, Compass Test, Driver's License Exam, TABE Test, etc.) \*\*This is not an exhaustive list. \*Passed is defined by industry standards and requirements, as well as benchmarks set by training providers, state and federal agencies, and partnering organizations.

<u>Career Planning</u>— The use of an Individual Service Strategy or Individualized Employment Plan, as required of all WIOA participants, to determine that occupational skills training is necessary in order for a participant to reach employment goals.

Career Advisors should use a mixed approach to determine if occupational training skills are appropriate and justifiable for participants. Staff-assisted individualized services and career services may be used in this process. However, there is no requirement that career service be provided as a condition to receive occupational skills training. If the recommended services are not provided before occupational training, however, case files must document the circumstances that justified the determination to provide training without any of these recommended career services [20 CFR 680.220)].

- 3. The participant must select a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in geographic areas to which the individuals are willing to commute or relocate [WIOA § 134(c)(3)(A)(i)(II); 20 CFR 680.210(b); TEGL 19-16].
- 4. Is unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, Federal Pell Grants, and TANF; or requires WIOA Title I-B assistance in addition to these other sources. In making the determination, WIOA programs may take into account the full cost of participating in training services, including the cost of support services and other appropriate costs [WIOA § 134(c)(3)(B)(i)(I); 20 CFR 680.210(c); 20 CFR 680.230; TEGL 19-16]. WIOA partners and other entities must coordinate funds available to pay for training. [20 CFR 680.230].

A WIOA Title I-B participant may enroll in WIOA-funded training while his or her application for a Pell Grant is pending as long as the American Job Center has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA Title I-B participant for education-related expenses, such as supportive services [20 CFR 680.230].

If the applicant is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination, training may be provided under WIOA Title I-B if all other eligibility requirements are met. 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 Title I-B [TEGL 19-16].

Training services provided by Southeast include:

- 1. Occupational skills training, including training for nontraditional employment (see ADWS Policy No. WIOA I-B 3.3 *Occupational Skills Training*)
- 2. On-the-job training (OJT), including Registered Apprenticeship (RA) training (see ADWS Policies No. WIOA I-B 3.4 *On-the-job Training* & 3.5 *Registered Apprenticeships*)
- 3. Incumbent working training (limited to no more than 20% of the funds granted to a local area for Adult and Dislocated Worker training [WIOA § 134(d)(4)]; see ADWS Policy No. WIOA I-B -3.6 Incumbent Worker Training)
- 4. Programs that combine workplace training with related instruction, which may include cooperative education programs
- 5. Training programs operated by the private sector
- 6. Skill upgrading and retraining
- 7. Entrepreneurial training
- 8. Job readiness training if it is provided in combination with training listed in 1-7 above or transitional jobs
- 9. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, if they are provided concurrently or in combination with training listed in 1-7 above
- 10. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training (see ADWS Policy No. WIOAI-B 3.7 Customized Training)

The selection of training services should be conducted in a manner that maximizes customer choice [20 CFR 680.340(a)], is linked to in-demand employment opportunities in the SEAWDB area or planning region or in a geographic area in which the adult or dislocated worker is willing to commute or relocate and is coordinated to the extent possible with other sources of assistance [TEGL 19-16].

SEAWDB will make available to customers the list of eligible training providers, a description of the programs through which the providers may offer the training services, and the performance and cost information about those providers [20 CFR 680.340(b)].

SEAWDB will work with representatives of secondary and postsecondary education programs to lead in the development and implementation of career pathways by aligning local employment, training, education, and supportive services needed by adults and youth, particularly individuals with barriers to employment [A.C.A. 15-4-3711(a)(8)].

# **Permitted Activities and Services**

Some adult and dislocated worker services are not required but are permissible to provide as appropriate. The following services are permitted activities and services [WIOA § 134(d); 20 CFR 680.140(b); TEGL 19-16]:

- Job seeker services, such as:
  - a. Customer support to enable individuals with barriers to employment (including individuals with disabilities) and veterans, to navigate among multiple services and activities for each population (See ADWS Policy No. WIOA I-B – 1.2 for definitions).
  - Training programs for displaced homemakers and for individuals training for nontraditional occupations, in conjunction with programs operated in the local areas (See ADWS Policy No. WIOA I-B – 1.2 for definitions).
  - c. Work support activities for low-wage workers, in coordination with American Job Center partners, which will provide opportunities for these workers to retain or enhance employment. These activities may include any activities available under the WIOA Adult and Dislocated Worker programs in coordination with activities and resources available through partner programs. These activities may be provided in a manner that enhances the worker's ability to participate, for example by providing them at nontraditional hours or providing on-site child care.
  - d. Supportive services that are necessary to enable an individual to participate in WIOA Title I-B activities [WIOA 3(59); 20 CFR 680.910(b); TEGL 19-16]. Supportive services may be provided only to individuals who are (a) participating in WIOA title I-B career (other than follow-up) or training services and (b) are unable to obtain supportive services through other programs providing such services [20 CFR 680.910(a); TEGL 19-16]. Supportive services are not stand-alone services, do not make an individual a participant, and do not extend participation [TEGL 19-16]. If funding is spent on supportive services, the need for such services, including inability to obtain services from other sources, must be documented in the participant's case notes. Supportive services may include, but are not limited to [WIOA § 3(59); [20 CFR 680.900; TEGL 19-16]:
    - i. Linkages to community services
    - ii. Assistance with transportation
    - iii. Assistance with child care and dependent care
    - iv. Assistance with housing
    - v. Needs-related payments to participants enrolled in training services
    - vi. Assistance with educational testing
    - vii. Reasonable accommodations for individuals with disabilities
    - viii. Legal aid services
    - ix. Referrals to health care
    - x. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
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- xi. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
- xii. Payments and fees for employment and training-related applications, tests, and certifications.

Refer to Southeast Supportive Services Policy for more information concerning supportive services.

e. Transitional jobs to individuals with barriers to employment and who are chronically unemployed or have an inconsistent work history (See Southeast *Work Experience Policy* for more information)

# 2. Employer services, such as:

- a. Customized screening and referral of qualified participants in WIOA Title I-B training services to employers
- Customized employment-related services to employers, employer associations, or other such organizations on a fee-for-service basis that are in addition to labor exchange services available to employers under the Wagner-Peyser Act Employment Service
- c. Activities to provide business services and strategies that meet the workforce development needs of area employers, as determined by the Southeast Arkansas Workforce Development Board and consistent with the Local Plan. These services [WIOA 134(d)(1)(A)(ix)]:
  - i. May be provided through effective business intermediaries working in conjunction with the local board and may also be provided on a fee-for-service basis or through the leveraging of economic development, philanthropic, and other public and private resources in a manner determined appropriate by the Southeast Arkansas Workforce Development Board.

#### ii. May include:

- Developing and implementing industry sector strategies (including strategies involving industry partnerships, regional skills alliances, industry skill panels, and sectoral skills partnerships)
- 2. Developing and delivering innovative workforce investment services and strategies for area employers, which may include career pathways, skills upgrading, skill standard development and certification for recognized postsecondary credential or other employer use, apprenticeship, and other effective initiatives for meeting the workforce development needs of area employers and workers
- 3. Assistance to area employers in managing reductions in force in coordination with allowed rapid response activities (see WIOA § 134(a)(2)(A)) and with strategies for the aversion of layoffs, which strategies may include early identification of firms at risk of layoffs, use feasibility studies to assess the needs of and options for at-risk firms, and the delivery of employment and training activities to address risk

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 The marketing of business services offered on a fee-for-service basis to appropriate area employers, including small and mid-sized employers

### 3. Coordination activities, such as:

- Employment and training activities provided in coordination with child support enforcement activities, as well as child support services and assistance activities, of the state and local agencies carrying out part D of title IV of the Social Security Act (42 U.S.C. 651 et seq.)
- b. Employment and training activities in coordination with cooperative extension programs carried out by the Department of Agriculture
- c. Employment and training activities in coordination with activities to facilitate remote access to services provided through the American Job Center network, including facilitating access through the use of technology
- d. Improving coordination between workforce investment activities and economic development activities carried out within the local area involved, and to promote entrepreneurial skills training and microenterprise services
- e. Improving services and linkages between the local workforce development system and employers, including small employers, in the local areas
- f. Strengthen linkages between the American Job Center network and the unemployment insurance programs
- g. Improving coordination between employment and training activities and programs carried out in the local area for individuals with disabilities, including programs carried out by state agencies relating to intellectual disabilities and development disabilities, activities carried out by Statewide Independent Living Councils established under section 705 of the Rehabilitation Act of 1973 (29 U.S.C. 796d), programs funded under part B of chapter 1 of title VII of the Rehabilitation Act of 1973 (29 U.S.C.796e et seq.), and activities carried out by centers for independent living, as defined in section 702 of the Rehabilitation Act of 1973 (29 U.S.C. 796a)
- 4. Implementing a Pay-for-Performance contract strategy for training services in accordance with 20 CFR 683.500 683.530 (limited to no more than 10% of adult and dislocated worker funds allotted to the local area)
- 5. Technical assistance for American Job Center partners, and eligible providers of training services, regarding the provision of services to individuals with disabilities in local areas, including the development and training of staff, the provision of outreach, intake, assessments, and service delivery, the coordination of services across providers and programs, and the development of performance accountability measures
- 6. Activities to adopt, calculate, or commission for approval, economic self-sufficiency standards for the local areas that specify the income needs of families, by family size, the number and ages of children in the family, and local geographic considerations.

- 7. Implementation of promising services to workers and businesses, which may include support for education, training, skill upgrading, and statewide networking for employees to become workplace learning advisors and maintain proficiency in carrying out the activities associated with such advising
- 8. Incumbent worker training programs, as described in ADWS Policy No. WIOA I-B 3.8 (*Work Experience*).

Approved:	
SEAWDB Chairperson	Date
Amended:	0
SEAWDB Chairperson	2/2/ /24 Date