



TECHNICAL ASSISTANCE - #TA-01-2022

TO: Chief Local Elected Officials
Workforce Development Board Chairs
Workforce Development Board Staff
WIOA Service Providers

FROM: Don Morris, Executive Director

DATE: June 28, 2022

SUBJECT: Coordination of Training Funds

PURPOSE: The Oklahoma Office of Workforce Development (OOWD), as the Governor’s chosen WIOA administrative entity, provides this technical assistance for the revision of the Coordination of Training Funds (COTF) form.

MESSAGE: Each LWDB and/or service provider must, to the extent possible, coordinate Title I funding with funding from other Federal, State, local, or private job training programs or sources when assisting an individual in obtaining training services. WIOA training services are limited to individuals who are unable to obtain other grant assistance for the cost of training or who require assistance beyond the assistance available under other grant assistance programs [WIOA 134(c)(3)(B)(I) and (II)].

Prior to the development of an ITA, an individual’s “unmet need” must be determined. Unmet need is defined as the cost of training not covered by grant assistance, educational entities, foundations, or other workforce partners. Local workforce development boards (LWDBs) may take into account the full cost of participating in training services, including supportive services and other appropriate costs related to attendance in a training program, when determining a WIOA Title I eligible individual’s unmet need. The Coordination of Training Funds (COTF) form is the tool utilized to determine if there is any unmet need.

Unmet need must be documented by the eligible training provider (ETP) on Section II of the COTF form. The cost of training supported by an ITA and/or the supportive services determined necessary to participate in career services and/or and training services, including needs related payments, may not exceed the participant’s unmet need. However, short term training programs that are not Pell eligible are an exception to the above statement. When the ETP indicates on the COTF form that the cost of training is equal to the unmet need and the training program is not Pell eligible, supportive services may be provided in excess of the unmet financial need on the COTF. The supportive service (or services) must be documented as necessary for the



WIOA-eligible individual to participate or continue in the approved program of training. The need for the supportive service(s) must be documented in the participant's Individual Employment Plan (IEP).

Revisions to the COTF form (Attachment C to the current Adult and Dislocated Worker Policy):

1. A statement in Section II to clarify that the training provider is not responsible for payment or obtainment of the items listed as "Other Expenses Related to Training", unless the items are documented in writing to the student. The added statement further clarifies that all expenses related to training that are required to be purchased directly from the training provider must be documented in writing in order for WIOA staff to authorize a direct payment to the training/educational entity for said items.
2. The addition of Section IV, which allows additional expenses related to training to be documented as necessary for training program attendance and completion. These Other Costs Related to Training (i.e., Supportive Services) must be documented and provided with appropriate justification for the need. Section IV may include Supportive Services that are not documented in Section II by the ETP, as well as additional needs determined later in the program enrollment for successful program completion.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients, and Sub-recipients/Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

ACTION REQUIRED: This document must be made available to all appropriate staff and sub recipients. The use of all other versions of Attachment C to OWDI #07-2020 and Attachment E to OWDI #02-2019 Change 2, should be discontinued. Attachment C to this Technical Assistance replaces all other versions of the aforementioned forms.

INQUIRIES: [If you have any questions about this issuance, please contact Staff in the Oklahoma Office of Workforce Development. Contact information can be found at http://www.oklahomaworks.gov/about/.](#)

COORDINATION OF TRAINING FUNDS

SECTION I: To be completed by WIOA Title I staff and forwarded to the Training Provider.

TO: FINANCIAL AID OFFICE

ATTENTION: _____

FROM: _____

TRAINING PROVIDER: _____

FAX OR E-MAIL ADDRESS: _____

TRAINING PROGRAM: _____

PARTICIPANT NAME: _____

FAX OR E-MAIL ADDRESS: _____

ID NUMBER: _____

I hereby authorize the exchange of information between the WIOA Case Manager and the Financial Aid Office of the above named Education/Training Facility regarding the cost of training and the award of any financial aid from any source.

Signature of Participant

Date

SECTION II: The following section is to be completed by the financial aid office and cannot be revised by WIOA staff.

Start Date: _____ PERIODS COVERED End Date _____

- Fall _____
- Spring _____
- Summer _____

- Trimester I
- Trimester II
- Trimester III

- Full Length of Short Course

COST OF ATTENDANCE *

STUDENT'S FINANCIAL AID

Tuition and Fees \$ _____

PELL Grant Eligibility \$ _____

Books, Supplies and Tools \$ _____

Student or Program is not PELL eligible

Uniforms \$ _____

ALL OTHER FINANCIAL RESOURCES, EXCLUDING LOANS AND VA BENEFITS

OTHER EXPENSES RELATED TO TRAINING **

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

TOTAL COST OF ATTENDANCE \$ _____

TOTAL FINANCIAL AID \$ _____

Total Cost of Attendance \$ _____ minus Student's Financial Aid \$ _____ equals Unmet Financial Need \$ _____.

By signing below, the financial aid officer (or the school's designated personnel who performs those duties) agrees to inform the local WIOA program operator of the amounts and disposition of financial aid awarded to the participant as part of a continuing, regular information sharing process. At the discretion of the Local Workforce Development Board, correction or changes to Section II must be documented by the submission of (1) a new COTF form or (2) the financial aid officer may revise the cost of training on the previously submitted COTF form by initialing and dating the changes. Option (2) requires a new signature and date of submission.

Financial Aid Officer

Date

*As defined by the Higher Education Act Section 472, enacted December 20, 2018.

**Other expenses related to training may include transportation, room and board (as defined by the Higher Education Act), vehicle insurance, and other items allowable in Section 472 of the Higher Education Act. Unless documented in writing to the student, the training provider is not responsible for payment or obtainment of the items listed as "Other Expenses Related to Training". Expenses related to training that must be purchased by students directly from the training provider must be documented in writing in order for WIOA to authorize payment directly to the training/educational entity for said items, including books, supplies, tools, uniforms, and any other items directly related to training.

SECTION III: The following section is to be completed by the WIOA Title I Case Manager.

After a comprehensive review of services provided by partner agencies, other social service agencies, and other community resources, I have determined that WIOA Title I funds are necessary for attainment of the participant's employment goal. I certify that WIOA funds will be coordinated with other funds and there will be no duplication of resources.

WIOA Title I Service Provider's Signature

Date

Title

SECTION IV: The following section is to be completed by the WIOA Title I Case Manager when there are additional known costs (i.e., Supportive Services) necessary for training program completion that are not included in Section II above. The costs may only include Supportive Services that are directly related to training and must be necessary for successful training program completion.

OTHER EXPENSES RELATED TO TRAINING	COST	JUSTIFICATION FOR NEED
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____

I have determined that WIOA Title I funds are necessary to provide the Other Expenses Related to Training [i.e., Supportive Service(s)] above to enable the WIOA-eligible participant to successfully participate in and complete the training program stated in Section I of this form. I certify that I have completed a thorough review of resources and services in the area and have determined that the items/services listed above are indeed related to training and are not available through partner entities, other social service agencies, or other community resources within the local service area, or cannot be provided in the time frame required for program entry or as necessary to prevent the participant from falling behind in the training program. Supportive Services are defined at WIOA 3(59) and must be provided in alignment with 20 CFR Part 680, Subpart G.

WIOA Title I Staff Signature

Date

Title