

## 24.11 VOCATIONAL EDUCATIONAL TRAINING (VT)/COLLEGE (CL)

### A. VOCATIONAL EDUCATIONAL TRAINING

Vocational Educational Training includes organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than a baccalaureate or advanced degree. This activity is limited to those programs that prepare participants for one specific trade, occupation, or vocation. This training is conducted in a non-work site or classroom setting. Vocational Educational Training programs should be limited to activities that give individuals the knowledge and skills to perform a specific occupation. These programs, while they may last longer than 12 months, and are in an approved Vocational Educational Training program, may not be counted for participation purposes for more than 12 months. Participants in Vocational Educational Training must be supervised daily.

For distance learning, countable participation hours only include classes which allow for monitoring of the participant while logged in and summarize what is achieved during the period engaged.

Although Vocational Educational Training may only be used for 12 months to meet Federal participation requirements, a participant in one program that lasts longer than 12 months who continues to make good progress must be allowed to complete the course of training. Participants meeting these requirements must not be placed in additional activities while they continue to make satisfactory progress in their course of study. Vocational training exceeding 18 months must be approved by the DFA Policy Unit.

Some Vocational Associate Degree Programs may combine coursework with actual work. For these courses the actual work placements may be counted as On-the-Job Training, if paid, or Work Experience if unpaid.

Masters or Doctorate programs must not be counted as VT for any period of time.

Vocational Educational Training must be provided by education or training organizations, which include but are not limited to:

- Vocational-technical schools
- Community Colleges
- Postsecondary institutions
- Proprietary schools

- Non-profit organizations
- Secondary schools that offer vocational education

**NOTE:** Effective October 1, 2008, attendance in all 2-year or 4-year College programs must be counted under vocational educational training for a maximum of 12 months lifetime under the VT component. Previously counted months of vocational training for individuals must be considered towards the 12 months allowable.

**NOTE:** Minor parents attending high school in a vocational educational track should be counted as participating under “satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence” to avoid triggering the lifetime 12-month limit on the use of Vocational Educational Training.

Types of vocational educational programs that would be allowed are listed under “Desk Guides and Participation Hours Charts” on the DFA Intranet website. Questions regarding types of training allowable under Vocational Educational Training are to be directed to the DFA Family Support Policy Unit.

#### 1. Placement Criteria

An individual, who has demonstrated the ability to do the course work and who meets the entrance requirements, may participate in Vocational Educational Training when:

- His goal is an occupation that requires completion of a vocational course prior to employment; or
- He has no job skills, or has only obsolete or non-marketable skills and must be retrained to find employment; or
- He does not have a high school diploma/or equivalent, and the skill training has been identified as an alternative which can lead to employment.

#### 2. Standards

The training institution and instructor must meet licensing and certification standards of the appropriate governing agency. Unlicensed or uncertified instructors are not approved for training when licensing or certification standards exist.

A participant’s evaluation for an appropriate skill training situation must include appropriate testing when the individual does not have a high school diploma or equivalent.

No client may be assigned to Vocational Educational Training unless the Worker is assured the client will accept training-related employment upon completion of the training.

### 3. Training

Participants must be placed into training positions on a no-cost basis if such positions are available through WORKFORCE WV, Department of Education, Veterans Administration and other providers, before additional training positions are developed.

WV WORKS staff may write training contracts for individuals without DFA approval for an amount up to \$600. Individual contracts which exceed \$600 must be approved by DFA. Group contracts are written by county staff, but must be approved by DFA, regardless of the amount. The training contract must be completed before the participant's first day.

### 4. Payment Limitations

Payments are limited to the cost of tuition, books, supplies and expenses associated with completing the course of study. Costs for medical procedures, such as Hepatitis B vaccines or physical exams, are not included. There is a cost limit of \$600/individual. This cost may be exceeded only with approval from DFA. To obtain approval to exceed the limit, a written request must be submitted to the Director of DFA and must include: the client's name, address, SSN, name of the training facility and the occupation for which training is sought. The request must also include the usual pay rate for the occupation as well as the current employment prospects and labor demands.

### 5. Calculation of Participation Hours

The calculation of hours for Vocational Educational Training follows the process below:

Step 1: Determine the client's total monthly hours as reported on his timesheet. This may include only the number of actual hours spent in class as well as time spent performing clinical requirements or lab time required for approved programs.

Step 2: Add 1 hour of unsupervised homework time for each hour of class time.

Step 3: Add supervised homework hours, if applicable. The total hours for unsupervised plus supervised homework time must not exceed the homework time required or advised by the educational program.

## WV WORKS Activities/Requirements

- Step 4: This combination of actual monthly classroom hours plus homework time is entered separately.
- Step 5: Time for excused absences, up to 16 hours for the month if no more than 80 hours have been incurred over the 12-month period just ended is entered separately as a monthly total. School holidays that are not federal holidays must be counted as one of the excused absences.
- Step 6: Hours for any classes missed due to a federal holiday that occurred during that month is entered separately as a monthly total.

**EXAMPLE:** Client attended class 66 hours for the current month. In addition, she had 4 hours of excused absence and 6 hours credit for a federal holiday. This is a 2-parent household.

|            |                                               |
|------------|-----------------------------------------------|
| 66         | hours of class time attended during the month |
| <u>+66</u> | hours unsupervised homework time              |
| 132        | hours of actual participation                 |
| <u>+ 4</u> | hours of excused absence                      |
| <u>+ 6</u> | hours credit for federal holiday              |

RAPIDS calculates the weekly average hours separately. The automatic calculation by RAPIDS is as follows:

|                                |                                                                   |
|--------------------------------|-------------------------------------------------------------------|
| $132 \div 4.33 = 30.48 = 30$   | average hours per week class time +<br>unsupervised homework time |
| $4 \div 4 = 1$                 | average hours per week for excused absence                        |
| $6 \div 4 = \underline{1.5=2}$ | average hours per week for federal holiday                        |
| 33                             | average hours of participation for the month                      |

**NOTE:** Do not enter weekly average hours. Enter only monthly hours. Entry of less than 2 hours per month under either excused absences or federal holidays will result in an average weekly hour calculation of "0" by RAPIDS for unpaid work activities.

## 6. Verification Of Hours And Payment Of Support Services

The participant must submit a monthly timesheet, DFA-TS-12, to document the number of days and hours he has attended during the month. The timesheet must be signed by the participant and the educational supervisor. Enrollment and schedule information will be requested by the Worker at the beginning of each term and copies of grades are required at the completion of each term to ensure the participant is maintaining satisfactory progress.

One hour of unsupervised homework time for each hour of class time may be counted as participation. No additional hours of study may be reported, unless they are monitored hours in an approved educational program. The total of all study time reported must not exceed what is required by the educational program. Faculty, instructors, instructional aides, lab supervisors, study hall supervisors, contractors, and educational providers are examples of educational staff that may be responsible for the daily supervision of participants.

**NOTE:** Use of 1 day in any month in the time limited component of VT uses 1 month of the 12 month lifetime limit. Support payments made after VT component closure for VT activities may be made under the current component for this reason.

**Example:** Ms. Jones' summer class ends on June 30<sup>th</sup>, her case manager disenrolls her from the VT component at that time and enrolls her in Job Search / Job Readiness (JR). After her time sheet is received in July, her Worker opens the VT component for 1 day to make the transportation payment. The month of July will then count as one of her 12 lifetime months in VT. To keep from using one of Ms. Jones' months, the Worker pays her June transportation under the JR component and makes thorough case comments.

## B. COLLEGE (CL)

Although College attendance does not count toward meeting the Federal participation requirements, the West Virginia State Code specifies that full-time College enrollment and attendance is an acceptable participation activity for the WV WORKS program. See Section 24.5,A,2, "Under WV State Law", regarding full-time attendance and satisfactory progress requirements.

Care must be made to correctly identify 18-month or 2-year Vocational programs being provided by Colleges and Community Colleges and that participants in those programs are enrolled in the VT Component.

Some under-graduate courses require that students be placed in an unpaid work environment. Such undergraduate placements may be used to meet the Federal work requirement. These placements include, but are not limited to: student teaching, internships, clinical work assignments and unpaid work experience. The portion including actual work must be counted as On-the-Job Training (OJ), if paid, or Work Experience (WE), if unpaid.

**NOTE:** See Section 24.11,A regarding counting up to 12 months of college as vocational educational training.

**NOTE:** Participants enrolled and attending college part-time must be enrolled in JT when the educational program meets the requirements of Section 24.13,A.

**NOTE:** Participation in College Work Study is employment.

Participants in all other 4-year degree programs must be enrolled in the College component and no additional hours are assigned to the participant as long as they are enrolled full-time and continue to make satisfactory progress.

Hours of participation for College are assigned according to the number of hours they attend class, plus 1 hour of study time.

School holidays that are not federal holidays must be counted as one of the excused absences. Summer breaks and semester breaks must not be counted toward participation. All other absences must meet the excused absence policy of no more than 16 hours per month and not more than 80 hours per 12-month period.

1. Meeting The State Requirement

The participant in the College component must not be assigned to participate in any other activity to meet the federal work requirement when he chooses to attend College, as long as he attends full-time as defined by the institution.

For each hour for which the client attends class, 1 hour of study time is counted toward his participation hours.

2. Participation Calculation

The calculation of College hours of participation follows the same process as Vocational Educational Training. See Section 24.11,A,5.

**EXAMPLE:** Client attends class 60 hours for the month. The following hours of participation are entered in RAPIDS:

|            |                                   |
|------------|-----------------------------------|
| 60         | attendance hours                  |
| <u>+60</u> | unsupervised study hours          |
| 120        | total monthly participation hours |

RAPIDS performs the following automatic calculation in determining the weekly average participation hours for this non-paid activity.

$$120 \div 4.33 = 27.71 = 28 \quad \text{average weekly hours}$$

**NOTE:** Please note that some College students may actually attend more hours than enrolled credit hours. This may occur when the student is required to participate in a lab, library activity, etc. which does not count towards his semester credit hours. This is significant when the credit hours are less than full-time during the current semester. In this case, the Worker must count all participation hours and confirm the details with the client. Make a full case recording in RAPIDS regarding the circumstances.

### 3. Payment Of Support Services

The participant must submit a monthly timesheet, DFA-TS-12, to document the number of days he has attended during the month. The timesheet must be signed by the participant in order to receive support services. Enrollment and schedule information will be requested by the Worker at the beginning of each term and copies of grades from each grading period will be obtained to ensure the participant is maintaining satisfactory progress towards program completion.