



Hennepin-Carver Workforce Development Board

Hennepin-Carver Workforce Development Board

Action Request: 2026-2

Topic: Adult and Dislocated Worker Program Policies

Board Meeting Date: March 18th, 2026

Item Description

Local policies governing the Workforce Innovation & Opportunity Act Adult and Dislocated Worker programs in WDA 09 (Hennepin-Carver).

Action Needed

A motion (and second) to approve the Local Policies governing the Adult and Dislocated Worker programs in WDA 09 (Hennepin-Carver).

Background

Per the Department of Employment and Economic Development (DEED), Local Workforce Development Areas (WDAs) areas are required to adopt local policies that align with State policies and govern various aspects of service delivery, program operations, and oversight of the WIOA Adult and Dislocated Worker programs. DEED requires local areas to develop the following policies:

- Applied to WIOA Adult and WIOA Dislocated Worker programs
 - Incumbent Worker Training
 - Supportive and Follow-up Services
 - Training Services
 - Career Services
 - Support Services and/or Training Services Dollars to Fund Purchases of Computer Hardware of Similar Technology
 - Electronic Document Storage
- Applied to WIOA Adult
 - WIOA Adult Eligibility and Priority of Service
- Applied to WIOA Dislocated Worker
 - WIOA DW Eligibility and Priority of Service

DEED has communicated via [Technical Assistance Response Letter \(TAR\) Letter 26-01](#) that Local Areas are able to adopt the State policies listed above as local policy. Hennepin-Carver WDA has chosen to adopt the State policies locally with no changes. Updating and implementing the policies above will ensure compliance with the state and federal local policy requirements.

Adult and Dislocated Worker programs must be administered following the parameters outlined in these policies by all Adult and Dislocated Worker service providers of the Hennepin-Carver WDA 09.

Staff Recommendation

Approve the Local Policies governing the Adult and Dislocated Worker programs in WDA 09 (Hennepin-Carver).

Attachments

- WDA09 Incumbent Worker Training Policy
- Supportive and Follow-up Services Policy
- Training Services Policy
- Career Services Policy
- Support Services and/or Training Services to Fund Purchases of Computer Hardware or Similar Technology Policy
- Electronic Document Storage Policy
- WIOA Adult Eligibility and Priority of Service Policy
- WIOA DW Eligibility and Priority of Service Policy



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult, WIOA Dislocated Worker, MN Dislocated Worker Policy: Incumbent Worker Training Programs

Policy Summary

Incumbent Worker Training (IWT) programs, authorized by the Workforce Innovation and Opportunity Act (WIOA), are unique training services for currently employed workers. IWT can assist employers retain a skilled workforce, avert layoffs and increase competitiveness. This policy establishes the requirements for IWTs.

Relevant Laws, Rules, or Policies

Workforce Innovation and Opportunity Act (WIOA) (42 USC 3101 et seq)

Code of Federal Regulations 20 (CFR) Part 682

Code of Federal Regulations 20 (CFR) Part 680

Training and Employment Guidance Letter (TEGL) 19-16 (March 1, 2017)

Training and Employment Guidance Letter (TEGL) 10-16, Change 3 (June 24, 2024)

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Local Policy Required

Local providers must have an updated and current policy on file that includes, at minimum, the information required by this policy. Provider policies must be made available to DEED upon request, either in hard copy or electronic formats. *This policy adopts that of the MN Department of Employment & Economic Development.*

This policy covers the following Dislocated Worker and Federal Adult Programs:

- WIOA Adult Program,
- WIOA Dislocated Worker Program,
- State Dislocated Worker Program,
- National Dislocated Worker Grants (DWGs), and,
- Certain special programs as applicable.

Note: Terms that are *Italicized* are also defined within the “Dislocated Worker and Federal Adult Programs (DWFAP) Terms and Definitions” document in the “Related Links” at the bottom of this policy.

Incumbent Worker Training Overview

Incumbent Worker Training (IWT) is a type of training service for currently employed workers. IWT is designed to increase the competitiveness of both businesses and employees by ensuring workers acquire the skills necessary to retain employment and advance within the business.¹ IWT eligibility is determined at the employer level by providers per local policy.

IWT can also be useful for Underemployed workers. An ideal IWT allows a participant to acquire new skills to move into a higher skilled and higher paid job within the business, thus allowing the organization to hire a job seeker to backfill the incumbent worker's position. IWT is also a vital layoff aversion strategy when used to upskill and re-skill workers to retain employment.²

All IWT proposals received by providers must meet the following three requirements:

1. Business Eligibility: Employer(s) must be eligible to receive and provide IWT, and,
2. Training Eligibility: The training itself must be appropriate for incumbent workers, and,
3. Incumbent Worker Eligibility: The incumbent worker(s) must be eligible to receive IWT.

Business Eligibility

Providers must ensure that all IWT employers are financially viable and:

1. Have been in business for at least one year,
2. Not currently be in bankruptcy or experienced bankruptcy within the past year,
3. Be current on all their local, state and federal tax obligations, and,
4. Not appear on any Federal suspensions or debarment lists.

Employers may be from the private (for-profit), certain non-profit or local government sectors. DEED encourages providers to prioritize IWT for private sector employers; however, there are instances where IWT for non-profit or local government employers may be appropriate.³

Employer Cost Sharing Requirements

Employers participating in IWT must pay the entire non-Federal share of the cost of the training for their incumbent workers.⁴ This amount can be paid either through cash payments or fairly evaluated in-kind contributions, including the wages the employer pays to the incumbent workers while attending training.⁵

The minimum amount of employer share depends on the size of the employer(s) and cannot be less than:⁶

- 10% of the cost for employers with 50 or fewer employees,
- 25% of the cost for employers with between 51 to 100 employees, and,
- 50% of the cost for employers with more than 100 employees.

Employer size is determined by the total number of current full-time and part-time employees (not just the number of incumbent workers being trained) currently employed at the local operation where the training placements will be made at the time of the execution of the training contract. The employer share cost contributions must be documented in the contract for service and must be tracked through invoices during the contract term.⁷

Training Eligibility:

Providers must ensure that all incumbent workers trainings:

1. Are designed to meet the special requirements of the employer(s) to retain a skilled workforce, or, to avert the need to lay off employees by assisting workers in obtaining the skills necessary to retain employment,⁸ **and**,
2. Be conducted with a commitment by the employer(s) to retain or avert the layoffs of the incumbent worker(s) trained.⁹

Providers must also consider the following when determining eligibility for incumbent worker trainings:

1. The characteristics (job titles, skill levels, employment sector, barriers to employment, wages, etc.) of the individuals in the program,
2. Whether the training improves the labor market competitiveness of the employee(s) or both the employee(s) and the employer(s),
3. Other factors the provider determines appropriate including but not limited to:¹⁰
 - a. The number of employees to be trained,
 - b. Projected wage and benefits improvements post training,
 - c. The existence of other training opportunities provided by the employer(s),
 - d. The credentials and skills gained as a result of the training,
 - e. The number of layoffs averted as a result of the training,
 - f. Utilization as part of a larger sector and/or career pathway strategy, and,
 - g. Employer size.

Incumbent Worker Training Provider:

Incumbent workers trainings can be provided through Minnesota's public or private educational institutions, private training organizations, trainers employed by the IWT employer(s), training provided in-house or a combination of training providers. Incumbent workers trainings do not need to be on the Minnesota Eligible Training Provider List (ETPL).

Disallowed Incumbent Worker Trainings:

Incumbent workers trainings cannot include:

- Provide skills for seasonal or temporary jobs,
- Provide skills for independent contractors,
- Personal development courses,
- Onboarding or new-hire trainings,
- Non-skill related assessments,
- English as a second language courses,
- Basic skills or remedial education,

- Directly or indirectly assisting, promoting, or deterring union organizing,¹¹ or,
- Mandated safety trainings (including Federal, State, union or employer mandated safety trainings).

Incumbent Worker Training Delivery, Location and Time:

Incumbent worker trainings may be done in-person, online, or in a hybrid environment. In-person trainings may occur at the employer(s) place(s) of business or another location (training center, classroom, etc.) and at whatever time is most appropriate.

Worker Eligibility

All the incumbent workers must:

- Be a U.S. citizen or have U.S. work authorization,
- Be employed and have Fair Labor Standards Act (FLSA) Employer-Employee Relationship with the IWT employer(s),¹²
- Have an established employment history with the IWT employer(s) for at least six months,¹³ and,
- Meet Selective Service registration requirements (if applicable, see DEED's Selective Service Registration policy).

Employer and Employer-Employee Relationship Clarification:

Employment must be with the IWT employer(s) as an employee and not as an independent contractor, seasonal worker, or temporary worker (Temp jobs, etc.). Employment may include full-time or part-time employees. There is no minimum number of hours that a part-time employee must work to qualify for IWT.

Note: Refer to Wage and Hour Division Fact Sheet #13 for more information on *Employee-Employer Relationship* determinations.

Six-Month Employment History Clarification

While independent contractors, seasonal workers, and temporary workers cannot receive IWT, periods (including non-consecutive periods) of this work for the same IWT employer do count towards an employee's time for the purposes of meeting six-month employment history requirement.¹⁴ Providers must develop a process for documenting the six-month employment history requirement and include it in the contract between the provider and IWT employer(s).¹⁵

For incumbent worker trainings that include multiple individuals in the same cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority (at least 51%) of those employees in the cohort meet the six-month employment history requirement.¹⁶

Use of Incumbent Worker Training Funds

Providers may use up to a combined 20% of WIOA Adult and WIOA DW funds to provide IWT at the local level. Similarly, up to 20% of State DW funds can be used for IWT.

Allowable costs for IWT are the same as the allowable costs for all other types of training services. For example, costs that qualify for reimbursement include (but are not limited to):

- Instructors'/trainers' salaries,
- Curriculum development,
- Textbooks and manuals,
- Materials and supplies,
- Tuition expenses, and,
- Off-site training space (i.e. classroom rental).

Unallowed Uses of Incumbent Worker Training Funds

IWT funds cannot be used for any of the following:

- Administrative costs
- Employee wages,
- Purchases of capital equipment or capital improvements,
- Purchases of items or services that will be used primarily outside of the incumbent worker training,
- Travel expenses for trainers or incumbent workers,
- Assessments, testing or certification fees, and,
- Advertisement or recruitment.

Note: Funds provided to employers for IWT must not be used directly or indirectly to assist, promote, or deter union organizing.¹⁷

Contract for Services

Contracts for services can be used to provide IWT instead of using an Individual Training Account (ITA). The Local Plan must describe the process to be used in selecting the providers under a contract for services. The contract must be between the Local Workforce Development Area (WDA) and the eligible employer. The contract commits the business to complete the training criteria as proposed in its application, as well as committing to compliance with all applicable local, State, and Federal laws.

Workforce One and Performance Reporting

Each incumbent worker must be enrolled in Workforce One and must meet DEED's case management requirements (see DEED's Case Management Policy in the "Related Links" section at the bottom of this policy). Providers must provide evidence that they have been in live contact with either the business or the training provider at some point every 30 days since the incumbent worker(s)'(s) enrollment. Case managers must include this documentation in each individual's case notes but can use the same live contact event for each participant. A participant's case file must also contain proof of their attendance at the training (i.e. their signature on a sign-in sheet), as well as a copy of any credential(s) obtained through the training (if applicable).

If an individual is only receiving incumbent worker training and no other WIOA Title I services, they are not considered a "participant" for the purposes of performance reporting

and are therefore not included in the State's federal performance metrics.¹⁸ However, providers must still collect the following four performance metrics to demonstrate the efficacy of the training in Workforce One:

- Demographic information
- Employment in the 2nd and 4th Quarters After Exit
- Median Earnings in the 2nd Quarter After Exit
- Credential Attainment

The exit date for an individual who has received only incumbent worker training will be the last date of training, as indicated on the training contract.

Related Links

- [Dislocated Worker and Federal Adult Programs \(DWFAP\) Terms and Definitions](#)
- [DEED's Case Management Policy](#)
- [WIOA Incumbent Worker Training Desk Reference](#)

¹ 20 CFR 680.780

² 20 CFR 682.320(b)(4)

³ TEGL 19-16 (p. 17)

⁴ 20 CFR 680.820

⁵ TEGL 19-16 (pp. 17, 18)

⁶ TEGL 19-16 (p. 18)

⁷ TEGL 19-16 (pp. 17, 18)

⁸ 20 CFR 680.790(a)

⁹ 20 CFR 680.790(b)

¹⁰ 20 CFR 680.810(c) and TEGL 19-16 (p. 16)

¹¹ 20 CFR 680.830

¹² 20 CFR 680.780

¹³ TEGL 19-16 (p. 16)

¹⁴ TEGL 19-16 (p. 16)

¹⁵ TEGL 19-16 (p. 17)

¹⁶ TEGL 19-16 (p. 16)

¹⁷ 20 CFR 680.830

¹⁸ TEGL 10-16, Change 3 (p. 39)



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult, WIOA Dislocated Worker, MN Dislocated Worker: Supportive and Follow-Up Services Allowable Activities

Policy Summary

This policy outlines the supportive and follow-up services in the Workforce Innovation and Opportunity Act (WIOA) and Minnesota State Statute 116L.17 programs administered by the Minnesota Department of Employment and Economic Development (DEED).

Relevant Laws, Rules, or Policies

Workforce Innovation and Opportunity Act (WIOA) (42 USC 3101 et seq)
Code of Federal Regulations 20 (CFR) Part 680
Code of Federal Regulations 20 (CFR) Part 678
Training and Employment Guidance Letter (TEGL) 21-22 (June 9, 2023)
Training and Employment Guidance Letter (TEGL) 19-16 (March 1, 2017)
Training and Employment Guidance Letter (TEGL) 16-16 (January 18, 2017)
Training and Employment Guidance Letter (TEGL) 12-19 (November 1, 2020)
Training and Employment Guidance Letter (TEGL) 10-16, Change 3 (June 11, 2024)
Training and Employment Notice (TEN) 12-21 (October 15, 2021)
Minnesota State Statute 116L.17

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Local Policy Required

Local providers must have an updated and current policy on file that includes, at minimum, the information required by this policy. Provider policies must be made available to DEED upon request, either in hard copy or electronic formats. DEED encourages providers to maximize career services within their respective policies as much as practical, within the limits of current requirements (Refer to “Relevant Laws, Rules, or Policies” at the top of this policy). *This local policy adopts that of the MN Department of Employment & Economic Development.*

Programs Covered

This policy applies to the following Dislocated Worker and Federal Adult Programs (DWFAP):

- WIOA Adult Program,
- WIOA Dislocated Worker Program

- State Dislocated Worker Program,
- National Dislocated Worker Grants (DWGs), and,
- Certain special programs such as the:
 - Minnesota Retaining Employment and Talent After Injury/Illness Network (RETAIN) Program, and,
 - Reentry Pilot Program.

Note: Terms that are *Italicized* are also defined within the “Dislocated Worker and Federal Adult Programs (DWFAP) Terms and Definitions” document in the “Related Links” at the bottom of this policy.

Local Provider Policies (Supportive Services):

Providers must have an updated and current policy on supportive services that outlines the resource and service coordination in the local area.¹ Local policies may include a maximum total amount of funding for supportive services available to a participant.² However, the policy cannot be so restrictive that it would result in a participant's failure to successfully complete their program(s).

Local Provider Policies (Follow-Up Services):

Providers must have an updated and current policy on follow-up services. These policies, among other things, must define what are considered to be appropriate follow-up services, and when to provide them to participants.³

Providers are encouraged to identify and establish partnerships with all relevant stakeholders to maximize resources and service offerings.⁴

Supportive Services:

Supportive services are services and assistance necessary for individuals to participate in their careers or training program(s).⁵ They are provided to participants on a case-by-case basis based on individual need(s). Participants must complete a financial needs analysis and an *Individualized Employment Plan* during program enrollment with their counselor to document their current financial situation and potential needs. Supportive services can only be paid for using WIOA or State funds when these services are not available through any other local agencies or organizations.

Note: Supportive services payments cannot be made for costs incurred prior to the individual's enrollment in the program.

See “Table One” below for a selected list of supportive services which may be provided to program participants. The list is not exhaustive, and it is meant to provide examples of services. DEED encourages providers to allow for and provide more supportive services than those listed, if able.⁶

Table One: Selected List of Supportive Services

Housing and Transportation Assistance	<ul style="list-style-type: none"> · Emergency housing or rental assistance,⁷ · Utilities and internet assistance, · Commuting and transportation assistance,⁸ · Relocation assistance to employ existing skills⁹
Family, Healthcare, and Dental Assistance	<ul style="list-style-type: none"> · Emergency healthcare or health assistance,¹⁰ · Emergency health insurance, · Dental assistance,¹¹ · Referrals to healthcare,¹² · Family care, including child or dependent care¹³
Counseling and Legal Assistance	<ul style="list-style-type: none"> · Personal, drug, or alcohol counseling,¹⁴ · Financial and legal counseling,¹⁵ · Legal aid services¹⁶
Work Attire and Work-Related Tools	<ul style="list-style-type: none"> · Uniforms or other work-related attire and work-related tools,¹⁷ · Work-related personal protective equipment such as eyeglasses and protective eye gear,¹⁸
Education and Job Search Assistance	<ul style="list-style-type: none"> · Out-of-area job search assistance,¹⁹ · Employment and training-related fees (i.e., conference parking fees, conference fees, background check fees, physical exams fees, application fees, etc.),²⁰ · Educational testing (i.e., test prep courses and materials, practice exams, etc.),²¹ · Books, fees, and supplies for post-secondary students not directly related to training (i.e. study materials, etc.),²² · Professional memberships. Note: Books, fees, and supplies directly related to participant training (i.e. required fees and/or supplies) may be paid for using training services funding.
Other Assistance	<ul style="list-style-type: none"> · Linkages to additional community services,²³ · Reasonable accommodations for individuals with disabilities,²⁴ · Food & nutrition services,²⁵ · Emergency National Farmworker Jobs Program assistance²⁶

WIOA Needs-Related Payments (NRPs):

NRPs are a type of supportive service that provides direct financial assistance to participants for the purpose of enabling them to participate in training. WIOA Adult and WIOA DW participants must be enrolled in training services programs receive NRPs.²⁷

Please note: Current DEED policy *prohibits* the disbursement of needs-related payments for Adult or Dislocated Worker program participants.

Supportive Services Documentation:

Case managers must document the type of supportive service(s) and the amount provided in the Support Service and Case Notes tabs within Workforce One. Supportive services cannot be used to extend the date of exit for participants in Workforce One.

Supportive Services Cannot Extend Exit:

Supportive services cannot 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 or extend participation.²⁸ Individuals identified as needing ongoing supportive services must still be participating in basic career services, individualized career services or/and training services to continue to receive supportive services.²⁹

Follow-Up Services:

Follow-up services are a type of career service³⁰ and must be available and provided, as appropriate, to former participants who are placed in *Unsubsidized Employment*, for at least 12 months after the first day of employment.³¹ Providers do not need to provide follow-up services to former participants if participants do not need/want them, but they must be available.

Follow-up services for WIOA Adult and DW programs may begin immediately following placement into *Unsubsidized Employment* if it is expected that the participant will not receive any future services other than follow-up services.³² There is no requirement that providers wait 90 days after individuals to begin follow-up services.

Follow-up services include, but are not limited to:³³

- Counseling about the workplace,
- Peer support groups,
- Assistance with work-related problems that may arise,
- Information about additional educational opportunities, and,
- Referral to supportive services available in the community.

Supportive services cannot be provided as part of follow-up services after individuals have exited their program(s).³⁴ Supportive services can only be provided to those participating in basic career services, individualized career services or/and training services.³⁵

Related Links

- [Dislocated Worker and Federal Adult Programs \(DWFAP\) Terms and Definitions](#)

¹ 20 CFR 680.900

² 20 CFR 680.920(a)

³ TEGL 19-16 (p. 3)

⁴ TEGL 16-16 (p. 5)

⁵ 20 CFR 680.910 and TEGL 19-16 (pp. 18, 19)

⁶ TEGL 21-22 (pp. 9, 10)

⁷ 20 CFR 680.900(d), TEN 12-21, Attachment I, and MN State Statute 116L.17 (4)(2)

⁸ 20 CFR 680.900(b) and State Statute 116L.17 (4)(2)

⁹ MN State Statute 116L.17 (4)(2)

¹⁰ MN State Statute 116L.17 (4)(2)

¹¹ MN State Statute 116L.17 (4)(2)

- ¹² 20 CFR 680.900(i)
- ¹³ 20 CFR 680.900(c)
- ¹⁴ MN State Statute 116L.17 (4)(2)
- ¹⁵ MN State Statute 116L.17 (4)(2)
- ¹⁶ 20 CFR 680.900(h)
- ¹⁷ MN State Statute 116L.17 (4)(2)
- ¹⁸ 20 CFR 680.900(j)
- ¹⁹ MN State Statute 116L.17 (4)(2)
- ²⁰ 20 CFR 680.900(l)
- ²¹ 20 CFR 680.900(f)
- ²² 20 CFR 680.900(k)
- ²³ 20 CFR 680.900(a)
- ²⁴ 20 CFR 680.900(g)
- ²⁵ TEN 12-21, Attachment I (p. 3)
- ²⁶ TEGL 18-16 Change I, Attachment I (pp. 9, 10)
- ²⁷ 20 CFR 680.930
- ²⁸ TEGL 19-16 (p. 19)
- ²⁹ TEGL 19-16 (p. 19)
- ³⁰ WIOA Sec. 134 and 20 CFR 678.430(c)
- ³¹ 20 CFR 678.430(c)
- ³² TEGL 10-16, Change 3 (p. 31)
- ³³ TEGL 19-16
- ³⁴ 20 CFR 680.910(a)(1) and TEGL 19-16 (p. 19)
- ³⁵ 20 CFR 680.910(a)(1)



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult and Dislocated Worker (WIOA and State) Policy: Training Services Allowable Activities

Policy Summary

This policy outlines the training activities under the Workforce Innovation and Opportunity Act (WIOA) and Minnesota State Statute 116L.17 programs administered by the Minnesota Department of Employment and Economic Development (DEED).

Relevant Laws, Rules, or Policies

Workforce Innovation and Opportunity Act (WIOA) (42 USC 3101 et seq)

Code of Federal Regulations (CFR) 20 CFR Part 680

Training and Employment Guidance Letter (TEGL) 19-16 (March 1, 2017)

Training and Employment Guidance Letter (TEGL) 13-16 (January 12, 2017)

Training and Employment Notice (TEN) 23-23 (March 5, 2024)

Minnesota State Statute 116L.17

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Local Policy Required

Local providers must have an updated and current policy on file that includes, at minimum, the information required by this policy. Provider policies must be made available to DEED upon request, either in hard copy or electronic formats. *This local policy adopts that of the MN Department of Employment & Economic Development.*

This policy includes the following Dislocated Worker and Federal Adult Programs (DWFAP):

- WIOA Adult Program,
- WIOA Dislocated Worker Program,
- State Dislocated Worker Program,
- National Dislocated Worker Grants (DWGs), and,
- Certain special programs such as the:
 - Minnesota Retaining Employment and Talent After Injury/Illness Network (RETAIN) Program, and,
 - Re-Entry Pilot Program.

Note: Terms that are *Italicized* are also defined within the “Dislocated Worker and Federal Adult Programs (DWFAP) Terms and Definitions” document in the “Related Links” at the bottom of this policy.

See “Table One” below for a selected list of training services which may be provided to program participants. The list is meant to provide examples of services and is not exhaustive.

Policy

This policy outlines the training activities under the Workforce Innovation and Opportunity Act (WIOA) and Minnesota State Statute 116L.17 programs administered by the Minnesota Department of Employment and Economic Development (DEED).

Table One: Selected List of Training Services

<p>Work-Based Training</p>	<p>Theses trainings include:¹</p> <ul style="list-style-type: none"> • <i>Occupational Skills Training (OST)</i>, including for <i>Nontraditional Employment</i>, • On-the-Job Training (OJT), • Registered Apprenticeship Programs (RAPs), • Incumbent Worker Training (IWT), • Cooperative education programs, • Private sector training programs, • Skills Upgrading and Retraining, • Entrepreneurial Training, • Customized Training (CT), • Basic and remedial education to enhance current skills,² and, • Transitional Jobs (TJs). <p>For the purposes of this policy, DWFAP notes <i>that Pre-Apprenticeships may</i> also be considered a training service, particularly if the training leads to an <i>Industry-Recognized Credential</i> or is approved by RAP sponsors that will prepare students with the skills needed to enter one or more RAP.³ Where <i>Pre-Apprenticeships</i> are not considered a training service, they may be considered a career service.⁴</p>
<p>Job Readiness Training</p>	<p>Includes <i>Job Readiness Training (JRT)</i> provided concurrently with:⁵</p> <ul style="list-style-type: none"> • <i>Occupational Skills Training (OST)</i>, including for <i>Nontraditional Employment</i>, • On-the-Job Training (OJT), • Incumbent Worker Training (IWT),

	<ul style="list-style-type: none"> • Workplace training and related instruction, which may include cooperative education programs, • Private sector training programs, • Entrepreneurial Training, • Customized Training (CT), and • Transitional Jobs (TJs).
Adult Education and Literacy Activities	<p>Includes <i>Adult Education and Literacy Activities</i> including English language acquisition and integrated education, <u>when provided concurrently with:</u>⁶</p> <ul style="list-style-type: none"> • <i>Occupational Skills Training (OST)</i>, including for <i>Nontraditional Employment</i>, • On-the-Job Training (OJT), • Incumbent Worker Training (IWT), • Workplace training and related instruction, which may include cooperative education programs, • Private sector training programs, • Skills upgrading and retraining, and, • Entrepreneurial Training.
Non-Credentialed Training	<p><i>Non-Credentialed Training</i>, which is an organized program or course of study that provides occupationally specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at intermediate or advanced levels but does not result in an <i>Industry-Recognized Credential</i> when successfully completed.</p>

Who Can Receive Training Services?

An individual must receive, at a minimum, a documented interview, evaluation or assessment and career planning or other means by which eligibility for WIOA-funded training services can be determined.⁷

Training services may be provided if the individual:⁸

- Is unlikely or unable to obtain or retain employment that leads to *Economic Self-Sufficiency* (Refer to DEED’s “Economic Self-Sufficiency” policy in the “Related Links” at the bottom of the policy) or wages comparable to or higher than wages from previous employment through career services alone;
- Needs training services to obtain or retain employment that leads to *Economic Self-Sufficiency* (Refer to DEED’s “Economic Self-Sufficiency” policy in the “Related Links” at the bottom of the policy) or wages comparable to or higher than wages from previous employment;
- Has the skills and qualifications to successfully participate in the selected program of training services;

- Is unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds or Federal Pell Grants or requires WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants;
- 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;
- Is determined eligible in accordance with the State and local priority system in effect for adults if training services are provided through the adult funding stream; and;
- Has been selected for a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individual is willing to commute or relocate.

Note: Refer to “TAA Approval of Classroom/Online Training” policy in the “Related Links” at the bottom of this policy for additional guidance for TAA-impacted workers.

Training Documentation:

All individuals interested in attending training must first complete a training proposal in consultation with their job counselor. Training proposals determine if a particular training is needed. The proposal should compare training institutions, cost, availability/start date, length of training and labor market data related to that specific training. Short term training is supported with a focus on training that results in a credential.

These services must be documented in the participant's Individual Employment Plan (IEP). A participant is not required to receive career services before receiving training services, however, there must be sufficient documentation in the participant's case notes to justify providing training services alone.

- Providers must coordinate training funds available and make funding arrangements with one-stop partners and other entities. One-stop centers/providers must consider the availability of other sources of grants to pay for training costs such as Temporary Assistance for Needy Families (TANF), State-funded training funds, and Federal Pell Grants, so that WIOA funds supplement other sources of training grants.
- A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the one-stop center/provider has planned 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 one-stop center/provider 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 participant for education-related expenses.

Individual Training Accounts (ITA)

Training services, when determined appropriate, must be provided either through an Individual Training Account (ITA) or through a separate training contract (See below for more information on training contracts). Additionally, providers may use a combination of ITAs and training contracts to provide training services.

When *WIOA funds* are used to pay for training services, the training provider must be listed on the WIOA Eligible Training Provider List (ETPL) unless the training is one of the five which are excluded (See “Training Contracts” below). *Pre-Apprenticeship* programs may also be funded using an ITA if it is a training service and on the ETPL.⁹

Note: The State of Minnesota observes ETPL reciprocity with other states, so WIOA trainings funds could be used with an out of state training institution if the program/course is on another state’s ETPL. When State funds are used to pay for training services, the training institution must be licensed, registered, or legally exempt by the Minnesota Office of Higher Education (OHE) or other appropriate state agency.

Note: You can find lists of registered training institutions and licensed career schools on OHE’s website. And out-of-state institutions recognized by OHE on SARA. There is not an online list of exemptions, as exemption letters issued by OHE expire two years after issuance. Proof of registered (print out from OHE website or SARA), licensed (print out from OHE website), or exemption status is required in the participant’s case file.

Training Contracts

As noted above, Individual Training Accounts (ITAs) are the primary method for procuring training services under WIOA. However, in certain circumstances, a training contract may be used to provide training services instead of an ITA. This is referred to as a "training exemption".¹⁰ Training contracts can only be used if at least one of the five circumstances listed below applies and the process for their use is clearly described by the Local Workforce Development Board in their Local Plan. The contract exemptions include:¹¹

1. On-the-Job Training (OJT), which may include paying for the OJT portion of a:
 - a. Registered Apprenticeship Programs (RAPs),
 - b. Customized Training (CT),
 - c. Incumbent Worker Training (IWT), or,
 - d. Transitional Job (TJ);
2. If the local Workforce Development Board determines that there are an insufficient number of Eligible Training Providers in the local area to accomplish the purpose of a system of ITAs. This determination process must include a 30-day public comment period for interested providers and must be described in the local plan;
3. To use a training services program of demonstrated effectiveness offered in a local area by a community-based organization or other private organization to serve

individuals with barriers to employment. The Local Workforce Development Board must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to Individuals with Barriers to Employment to be served. The criteria may include:

- a. Financial stability of the organization
 - b. Demonstrated performance in the delivery of services to *Individuals with Barriers to Employment* through such means as program completion rates; attainment of skills, certificates, or degrees the program is designed to provide; placements after training in *Unsubsidized Employment*, and retention in employment; and
 - c. How the specific program relates to the workforce investment needs identified in the local plan;
4. If the Local Workforce Development Board determines that the most appropriate training could be provided by an institution of higher education or other provider of training services in order to facilitate the training of a cohort for jobs in-demand sectors or occupations, provided that the contract does not limit consumer choice;¹² and,
 5. If the Local Workforce Development Board determines a pay-for-performance contract is suitable consistent with 20 CFR 683.500 (Note: No more than 10% of the local funds may be spent on pay-for-performance contract strategies).¹³

Local WDBs 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 RAPs and other similar types of training.¹⁴

Related Links

- Dislocated Worker and Federal Adult Programs (DWFAP) Terms and Definitions
- TAA Approval of Classroom/Online Training Policy

¹ 20 CFR 680.200, 20 CFR Part 680 Subpart F, and TEGL 19-16 (Page Seven)

² MN State Statute 116L.17 Sub. 4(3)

³ TEN 23-23 (Page 11)

⁴ TEN 23-23 (Page 13)

⁵ 20 CFR 680.200(i) and TEGL 19-16 (Page Seven)

⁶ 20 CFR 680.200(j) and TEGL 19-16 (Page Seven)

⁷ 20 CFR 680.220(a)

⁸ 20 CFR 680.210 and TEGL 19-16 (Pages Five and Six)

⁹ TEGL 13-16 (Page 11) and TEN 23-23 (Page 13)

¹⁰TEGL 19-16 (Page Seven)

¹¹ TEGL 19-16 (Pages Seven and Eight)

¹² TEGL 19-16 (Page Eight)

¹³ TEGL 19-16 (Page Eight)

¹⁴ TEGL 19-16 (Page Eight)



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult, WIOA Dislocated Worker, MN Dislocated Worker: Career Services Allowable Activities

Summary

This policy outlines the career service activities under the Workforce Innovation and Opportunity Act (WIOA) and Minnesota State Statute 116L.17 programs administered by the Minnesota Department of Employment and Economic Development (DEED).

Relevant Laws, Rules, or Policies

Workforce Innovation and Opportunity Act (WIOA) (42 USC 3101 et seq)

20 Code of Federal Regulations (CFR) Part 680

Training and Employment Guidance Letter (TEGL) 19-16 (March 1, 2017)

Training and Employment Notice (TEN) 23-23 (March 5, 2024)

Minnesota State Statute 116L.17

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Local Policy Required

Local providers must have an updated and current policy on file that includes, at minimum, the information required by this policy. Provider policies must be made available to DEED upon request, either in hard copy or electronic formats. DEED encourages providers to maximize career services within their respective policies as much as practical, within the limits of current requirements (Refer to “Relevant Laws, Rules, or Policies” at the top of this policy). *This local policy adopts that of the MN Department of Employment & Economic Development.*

Programs Covered

This policy includes the following Dislocated Worker and Federal Adult Programs (DWFAP):

- WIOA Adult Program,
- WIOA Dislocated Worker Program,
- State Dislocated Worker Program,
- National Dislocated Worker Grants (DWGs), and,
- Certain special programs such as the:
 - Minnesota Retaining Employment and Talent After Injury/Illness Network (RETAIN) Program, and,
 - Reentry Pilot Program

Note: Terms that are *Italicized* are also defined within the “Dislocated Worker and Federal Adult Programs (DWFAP) Terms and Definitions” document in the “Related Links” at the bottom of this policy.

Policy Summary

This policy outlines the career service activities under the Workforce Innovation and Opportunity Act (WIOA) and Minnesota State Statute 116L.17 programs administered by the Minnesota Department of Employment and Economic Development (DEED).

Career Services:

Career services are those intended to assist participants in obtaining, retaining, and advancing their employment and careers. There are three types of career services: Basic career services, individualized career services, and follow-up services.¹

Basic Career Services:

Basic career services must be made available to all participants seeking employment and training services in at least one comprehensive American Job Center per local area. These services typically involve less staff time and involvement.²

Individualized Career Services:

Individualized career services must be based on the employment needs of the individual as determined jointly by the participants and provider and may be identified through a participant’s Individual Employment Plan (IEP).³

Follow-up Services:

Follow-up services occur after exit and must be provided for participants who are placed in *Unsubsidized Employment*, for up to 12 months after the first day of employment.⁴ See “Table One” below for a selected list of career services which may be provided to program participants. The list is not exhaustive, and it’s meant to provide examples of services.

Table One: Selected List of Career Services

Basic Career Services	<p>Basic career services must include the following:</p> <ul style="list-style-type: none"> · Determinations of whether an individual is eligible to receive assistance from the WIOA Adult, WIOA DW, or State DW programs, · Program outreach, intake, and orientation, · Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive services’ needs, · Local job search assistance (self-directed),⁵ · Local job search assistance (staff assisted),⁶ · Career counseling and staff-assisted career guidance,⁷
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	<ul style="list-style-type: none"> · Information, referrals, and associated coordination (and availability) of activities with other programs and services, including support services,⁸ · Assistance establishing eligibility for financial aid, · Information and meaningful assistance applying for unemployment insurance, and, · <i>Job Placement</i> (staff assisted),⁹ <p><u>Also included is providing information on:</u></p> <ul style="list-style-type: none"> · In-demand sectors, occupations, or non-traditional employment,¹⁰ · Performance and program costs for providers of education and training, · Workforce and labor market employment information or statistics, · Job skills necessary to fill vacancies · Job vacancies, and, · Local performance.
Individualized Career Services	<p>Individualized career services must be based on the employment needs of the individual and include the following:</p> <ul style="list-style-type: none"> · Comprehensive and specialized assessments, · Development of the IEP, · Group counseling, · Individual counseling, · Career planning, · Short-term prevocational services, · <i>Work Experiences</i> (including internships and transitional jobs), · Workforce preparation activities, · Financial literacy services, · Out-of-area job search and relocation assistance,¹¹ and, · English-language acquisition and integrated education and training programs. <p>For the purposes of this policy, DWFAP notes that <i>Pre-Apprenticeships</i> may also be considered an individualized career service if such programs are not already considered a training service.¹² Particularly if the training does not lead to an <i>Industry-Recognized Credential</i> or is not approved by Registered Apprentice Program (RAP) sponsors that will prepare students with the skills needed to enter one or more RAP.¹³</p>

Note: See the “Supportive and Follow-Up Services Allowable Activities” policy in the “Related Links” section at the bottom of this policy for additional information on follow-up services.

Transitional Jobs:

Transitional jobs (TJs) are a type of Individualized career service that provide time-limited work experience. TJs can be in the public, private, or non-profit sectors and include work that is:¹⁴

- Wage-paid and subsidized, and,
- *For Individuals with Barriers to Employment* who are chronically unemployed or have *Inconsistent Work History*, as determined by the Local Workforce Development Board (WDB).
-

TJs are designed to enable an individual to establish a work history, demonstrate work success in an *Employee-Employer Relationship*, and develop the skills that lead to *Unsubsidized Employment*.¹⁵ TJs must be combined with comprehensive career services (Basic career services, individualized career services, and follow-up services) and *Supportive Services*.¹⁶

Note: See the “WIOA Transitional Jobs Desk Reference” document in the “Related Links” section at the bottom of this policy for additional information on TJs.

Related Links

- Dislocated Worker and Federal Adult Programs (DWFAP) Terms and Definitions
- Supportive and Follow-Up Services Allowable Activities Policy
- WIOA Transitional Jobs Desk Reference

¹ TEGL 19-16 (p. 2)

²TEGL 19-16 (p. 3)

³ TEGL 19-16 (p. 2)

⁴ TEGL 19-16 (p. 3)

⁵ Cannot be an “Out-of-area” job search as that would be considered an Individualized career service. See TEGL 19-16, Attachment II (p. 3)

⁶ 20 CFR 678.430(a)(4)(i) and TEGL 19-16, Attachment II (p. 1). Cannot be “Out-of-area” job search as that would be considered an Individualized career service. See TEGL 19-16, Attachment II (p. 3)

⁷TEGL 19-16, Attachment II (p. 1)

⁸ TEGL 19-16, Attachment II (p. 2)

⁹ 20 CFR 678.430(a)(4)(i) and TEGL 19-16, Attachment II (p. 1)

¹⁰ TEGL 19-16, Attachment II (p. 1)

¹¹ TEGL 19-16, Attachment II (p. 3)

¹² TEN 23-23 (p. 11)

¹³ TEN 23-23 (p. 13)

¹⁴ 20 CFR 680.180



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult, WIOA Dislocated Worker, MN Dislocated Worker: Electronic Document Storage

Summary

This policy outlines the requirements for the implementation and use of Electronic Document Storage (EDS) for all federal and state adult and youth Employment and Training Workforce Development Programs under the authority of the Department of Employment and Economic Development (DEED). Local Workforce Development Associations (LWDAs), and other Employment and Training Program (ETP) Partners are required to use EDS in the Workforce One (WF1) System for participant file management.

Relevant Laws, Rules, or Policies

[WIOA Performance Reporting \(DOL\)](#)

[WIOA Public Law 133-128](#)

[TEGL No. 7-18 Joint Data Validation Guidance Per WIOA \(Dated 12-19-18\)](#)

[TEGL No 10-16, Change 2 Performance Accountability Guidance for WIOA \(Dated 9-15-22\)](#)

[TEGL No 14-18 Aligning Performance Guidance Across ETP \(Dated 3-25-19\)](#)

[TEGL No 14-21 Performance Guidance for PY21 & PY22 \(Dated 10-27-21\)](#)

[TEGL No 23-19, Change 1 Data Validation Guidance \(Dated 10-25-22\)](#)

[TEGL No 23-19, Change 2 Clarifying Data Validation Instructions \(Dated 5-12-23\)](#)

[2 CFR 200.328 Fiscal and Performance Reporting](#)

[20 CFR 667.300 Reporting Requirements](#)

[20 CFR 677.240 State Data Validation Requirements](#)

[81 FR 55792 Joint Rule Performance \(Dated 8-19-2016\)](#)

[81 FR 73140 OMB WIOA Information Collection \(Dated 10-24-2016\)](#)

[Government Performance and Results Act \(GPRA\) of 1993 \(Public Law 103-62; 107 Stat. 285\)](#)

[2180.2 CIO GSA Rules of Behavior for Handling Personally Identifiable Information \(PII\) Chapter 13 – Government Data Practices \(Minnesota\)](#)

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Local Policy Required

Local program providers must develop and maintain a local Electronic Document Storage (EDS) policy. This policy may serve as the adopted local policy or may be referenced in a local policy under a different name, but it must contain the required actions listed in this policy. *This policy adopts that of the Minnesota Department of Employment & Economic Development.*

Background

In 2017, the State of Minnesota launched Workforce One (WF1) Electronic Document Storage (EDS), which allows local Employment and Training Program Partners to upload, search, and maintain participant file documents. Previously this documentation was stored in a paper file or other document management systems. The EDS functionality in WF1 provides local program partners with the ability to transition from paper to digital files, storing all required participant information and required source documents in one central file.

Policy Summary

Local state and federal Employment and Training Program Partners must transition from paper (hard) copy participant files to maintaining electronic participant records using Workforce One (WF1), which includes the upload of all required participant source documentation into Electronic Document Storage (EDS) also known as Document Summary within WF1. By doing so, this ensures records are available for data validation, reporting, and monitoring. Additionally, the participant's personal information will be protected by limiting the use of paper documentation and storage.

Employment and Training Programs (ETP) subject to using EDS to maintain participant source documentation include (not exhaustive):

- Adult Career Pathways (ACP)
- Direct Appropriations
- Minnesota Youth Program
- Minnesota Jobs Skills Programs (MJSP)
- National Dislocated Worker (DWG)
- Robotics
- State Dislocated Worker
- Trade Adjustment Assistance (TAA)
- WIOA Adult
- WIOA Dislocated Worker
- WIOA Youth
- Youth At Work
- YouthBuild

Capital grants and other Employment and Training Programs that do not provide case management to participants are exempt from this requirement, which must be noted within the DEED grant contract.

Purpose

To assist grantees with designing and implementing an effective EDS policy, procedure, and practice utilizing EDS to safeguard participants personal identifying information by limiting the use of paper documentation and to improve data access, collection and accuracy needed for performance as a state.

Benefits of EDS

- Allows for the immediate sharing and retrieval of documents.
- Provides secured document storage for confidential and sensitive information.
- Ensures the documents are preserved and do not get lost or damaged.
- Eliminates paper files, which reduces the need for storage space and specialized filing cabinets.
- All files are centrally stored in EDS WF1.
- Documents are accessible by all parties who are monitoring and/or providing services to enrolled/co-enrolled participants.
- Ease of case transfer from one agency to another. No need to transfer paper files.
- Ensures federal and state compliance with reporting and data validation.

Implementation Timeline

Federal grant recipients must upload and maintain participant source documentation in WF1 EDS as of July 1, 2024 for all active participants as well as new enrollees for Program Year (PY) 24 and years following. This includes the upload of any participant source documents needed for Program Year (PY) 23 to complete data validation and monitoring.

State grant recipients must upload and maintain participant source documentation in WF1 EDS as of July 1, 2025 for all active participants as well as new enrollees for State Fiscal Year (SFY) 26 and years following. This includes the upload of any participant source documents needed for State Fiscal Years (SFY) 24 & 25 to complete monitoring.

EDS Training

DEED will offer a series of EDS training webinars for all Employment and Training Partner Staff in July and August of 2024. A recording of the webinar will be posted onto DEED's website.

EDS Requirements

Each local partner is responsible for the development and implementation of an Electronic Document Storage (EDS) procedure at their local agency. Below includes some guidelines.

Local partner responsibilities:

1. Upload all required participant source documents into EDS (as applicable by program). If there are co-enrolled participants, all required documentation must be uploaded for each enrollment.
2. Follow Attachment I - WF1 Document Storage Navigation Guide for WF1 folder and naming,
3. Refer to Data Validation Policy Attachment II for a complete list of allowable and required source documents for federal programs.
4. Use consistent naming conventions when labeling documents.
5. Ensure participant source documents are complete, readable, and legible.
6. Describe any additional user defined documents not outlined within the WF1 Document Storage Navigation Guide.
7. Establish internal controls and staff roles.
8. Ensure appropriate staff are trained on EDS.

Sample grantee staff roles could include:

- Management Information System (MIS) Manager– responsible for agency-wide data and data practices.
- Program Manager/Supervisor or Data Compliance Specialist – responsible for case management file reviews.
- Intake Supervisor– responsible for the eligibility and monitoring of specific data entry and file retention.
- Intake Staff/Technician/Administrative Specialist –responsible for scanning or uploading documents.

EDS Timeline Requirement

All participant documents related to a participant's file **must be uploaded and saved electronically in EDS within 15 business days**. Additionally, if a local agency is using more than one tracking system and dual entry is required, the same timeline of 15 business days applies to dual entry and/or co-enrollment entries between programs – as these are manual entries. Delays must be explained within a case note.

Paper Retention

Paper documentation may be shredded once the local partner/employment counselor has verified participant source documents are legible, accurate, complete, and successfully uploaded to the correct individual.

Local partners may implement procedures requiring longer paper retention periods to meet the needs of their program and organization. **However, if a local partner chooses to maintain hard copy participant documents, they must be saved within a secured location and cannot be stored in unlocked office areas or in personal homes, cars, desktops, etc.**

Medical Records Confidentiality

Documents containing identifiable health information such as health status, provision of health care, or payment for health care must be marked as "private" within EDS to ensure confidentiality in accordance with all federal and state guidance related to confidentiality and the handling of protected information.

Definitions

Data Validation - A series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.

Co-enrollment Participant - A program participant in multiple programs

EDS (Electronic Document Storage) - Electronic Document Storage (EDS) is the function within Workforce One that grantees will use to upload, search, and view case file documents saved within Workforce One.

EDS Document Name - EDS Document Name is the Workforce One Title of the Document in EDS. Grantees select the document name from a predefined list when uploading a document.

EDS Document Type - EDS Document Type is a field within Workforce One that helps identify the type of document being uploaded. Grantees select the EDS Document Type from a predefined list when uploading a document.

EDS Folder – EDS Folder is a field within Workforce One, which is used to help segregate documents. In addition to identifying an EDS Document Type, Document Name, grantees will also enter the name of an EDS Folder to documents that are uploaded into Workforce One.

Participant Source Documentation – Participant source documentation are documents maintained within a participant's file to demonstrate eligibility and services provided to a program participant. Some examples may include a program application, copy of a government ID, a self-attestation, copy of a social security card, a signed individual employment plan, a signed How we use your personal information/EEO (Tennessee) form, and other documents required per program requirements.

PII (Personal Identifying Information) – PII is any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Further, PII is defined as information: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e.,

indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors). Additionally, information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. This information can be maintained in either paper, electronic or other media.

WF1 Document Storage Navigation Guide - A guide created by DEED to help grantees, service providers and their staff with the path needed for the upload of participant documents within WF1 Document Storage as well as the naming conventions to use to ensure consistency across agencies when labeling EDS files. See Attachment 1 of this policy for the guide.

Workforce One Connect App - WF1 Connect is a mobile app designed to allow participants enrolled in public services across multiple Minnesota state agencies, including DEED to communicate with local partner staff easily and securely as well as remotely submit documents necessary for compliance using their phone or tablet.

Related Links

- [WF1 Document Storage Navigation Guide](#)



Hennepin-Carver Workforce Development Board

WDA 09 Adult, WIOA Dislocated Worker, MN Dislocated Worker Policy: Financial Assistance for Computer Hardware and Similar Technology

Policy Summary

This policy provides guidelines for the WIOA Adult and Dislocated Worker program's financial support of the purchase of computer hardware and/or similar technology. *This policy adopts that of the MN Department of Employment & Economic Development.*

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

REQUIRED ACTION

ACTION

The information contained herein is to be used in determining the degree to which the WIOA Adult and Dislocated Worker programs' support services and/or training budgets can financially support the purchase of computer hardware and/or similar technology to assist in successful completion of training intended to secure employment.

BACKGROUND

Program providers offer support services and training program assistance to participants seeking assistance in returning to work as quickly as possible. Computers and/or similar technology are allowable elements of support service and training program assistance, but constitute a special category of tools due to their high cost, rapid rate of depreciation, and extremely broad use. Both state and federal officials recognize the potential for inefficient spending, or even abuse, without appropriate controls in place. That said, DEED understands that it can be difficult to pursue certain training programs without ready access to a computer, and only requires local providers to have a policy in place that will govern the process for these expenditures.

This policy outlines necessary controls, allowing program counselors to balance quality customer service and appropriate taxpayer accountability.

PROCEDURES

WIOA Adult and Dislocated Worker program funds will pay for or reimburse a purchase of the participants' expenditures for computer hardware and/or similar technology purchases.

DEED requires that each local provider establish a policy that will govern the use of support service and/or training dollars to fund purchases of computer hardware or similar technology. Each organization must ensure the following:

1. The computer is required.
2. The customer does not otherwise have access to a required computer.
3. The price is reasonable.

DEED also recommends that providers' policies address the following issues:

- Whether the parameters apply for all types of training – in-class training, on-line courses, on-the-job training (substituting “employer” for “school” or “professor”) and so on;
- Whether the counselor must document the need for use of a computer and/or similar technology in the customer's files;
- Whether the customer must acquire the computer first, and then seek reimbursement. Upon purchasing the computer, does the participant need to retain the receipt and provide a copy to the counselor in order to receive any reimbursement?;
- Whether the provider will, when cost-efficient, enter into purchase arrangements with the student's school in which the school acquires the computer and then seeks reimbursement, as long as the school (on the student's behalf) meets the above requirements;
- If a student does not complete the training which requires the computer and/or other similar technology, local service providers reserve the right to reacquire the tool and/or to bill the individual for overpayment. The Office of Management and Budget requires such reacquisition, if the cost of the capital investment exceeds

\$5,000. In cases of reacquisition, the tool becomes agency property. The agency will make all reasonable and legally required efforts to protect the private information which may exist on the hard drive; and

- Given the ongoing cost of renting or leasing computers and other similar technology, DEED does not endorse this path for customers except as a last resort. We understand that there are circumstances in which a rental or lease makes sense. Customers should document the reasons they believe that a rental or lease of the tool is necessary.



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Adult: Eligibility and Priority of Service

Policy Summary

This policy establishes criteria necessary to determine whether an individual is eligible for the WIOA Adult program and describes the priority of service requirement with respect to funds for individualized career services and training services.

Relevant Laws, Rules, or Policies

[Lower Living Standard Income Level](#)

Effective Date: March 18, 2026

Last Updated:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Policy

Local Policy Required

Local providers are required to have an updated policy on file that includes, at minimum, the information required by this policy. The policy may be incorporated into the Local Plan or exist as a standalone document. Local policies must be made available to DEED upon request. *This policy adopts that of the Minnesota Department of Employment & Economic Development.*

Eligibility Requirements

The following is the eligibility criteria for the Workforce Innovation and Opportunity Act (WIOA) Adult Program. Documentation verifying the eligibility of participants is mandatory. Eligibility determination must be made prior to enrollment in the WIOA Adult program and receipt of any individualized career, training or supportive services. Each participant must receive an initial assessment of need for services to ensure that the local area is providing employment and training opportunities to those who are most in need of such services.

Individuals must meet the following eligibility criteria to participate in the WIOA Adult Program:

- U.S. citizen or otherwise legally entitled to work in the United States;

- Age 18 or older; and
- In compliance with Selective Service Registration requirements (see DEED's Selective Service Registration Policy)

Priority of Service

Individuals in the targeted groups below are given priority to receive individualized career services, training services, and supportive services funded by the WIOA Adult program over other individuals who may also be meet eligibility requirements for the program. Veterans and eligible spouses within these groups receive priority over non-veterans. This priority of service is in place at all times, regardless of availability of funds.

Priority of service is determined for the targeted groups during eligibility and prior to enrollment and must be accurately documented in Workforce One. If an individual who does not meet the priority of service requirements is already enrolled in the program and has begun receiving services, this policy does not require the service provider to discontinue services when other individuals who meet priority of service enroll in the program.

The priority of service established in the previous paragraph does not mean that these services must be provided exclusively to individuals who meet these priority of service categories. State and Local Workforce Development Boards (WDBs) may add additional priorities of service under the 4th Category/Priority in this policy.

Priority of service for WIOA Adult participants must be provided in the following order (i.e. individuals in the first category are prioritized first, individuals in the second category are prioritized second, etc.):

- 1st Priority of Service - Veterans and eligible spouses (covered persons) who are:
 - Low income, or
 - Recipients of public assistance, or
 - Who are basic skills deficient

*Note: military earnings should not be included when calculating income for veterans or transitioning service members for this priority

- 2nd Priority of Service - Individuals who are not Veterans and eligible spouses (non-covered persons) who are:
 - Low income, or

- Recipients of public assistance, or
- Who are basic skills deficient
- 3rd Priority of Service - Veterans and eligible spouses who are:
 - Not low income, or
 - Not recipients of public assistance, and
 - Are not basic skills deficient
- 4th Priority of Service – Priority populations established by the Governor and/or Local WDBs. These priorities must be clearly outlined in the State and Local plans. Any individuals identified in this category receive priority of service after priority has been given to individuals in Priority Categories 1, 2 and 3. Current State and Local Plans can be found on DEED’s WIOA website under the “State Plan” and “Regional and Local Plans” tabs.
- 5th Priority of Service – All other eligible individuals who do not meet any of the Priority of Service categories. The vast majority of individuals enrolled in the WIOA Adult program should meet the criteria for Priority of Service Categories 1, 2, 3, and 4.

Employment Status Clarification

Individuals do not need to be unemployed to qualify for the WIOA Adult Program. Participants who are unemployed or underemployed and meet any of the priority of service criteria may receive program services on a priority basis. Individuals with Barriers to Employment do not independently qualify to receive priority of service in the WIOA Adult Program, unless they are also low income, recipients of public assistance and/or basic skills deficient or are identified as a priority group by the State or Local WDBs in the State or Local Unified Plans.

For the purposes of this policy, “underemployed” means individuals who meet any of the following criteria:

- Are employed less than full-time but who are seeking full-time employment.
- Are employed in a position that is inadequate with respect to their skills and training. A position is considered inadequate if a person has obtained a postsecondary degree and is working in a low-skill, low-wage job; or has obtained an industry-recognized credential or training certificate but is working in a low-skill, low-wage job

- Are employed full-time or part-time but still meet the definition of a low-income individual
- Are employed full-time or part-time but whose current job's wages are insufficient compared to their previous job's earnings. Insufficient wages are defined as wages less than 80% of the worker's wages from their previous job at their previous employer
- Were laid-off from a previous job but have found interim/stop-gap employment

Participant File Documentation

DEED requires local providers to capture accurate and timely priority of service information for all WIOA Adult participants in Workforce One who meet priority of service in Categories 1-4. This information will be used to ensure local compliance with the priority of service requirements during monitoring visits and may also impact the local area's ability to negotiate performance standards using the mandated statistical adjustment model

Definitions

Basic skills deficient - an individual who:

- Lacks a high school diploma or high school equivalency and is not enrolled in secondary education, or
- Is currently enrolled in a WIOA Title II Adult Education/Literacy program (ABE Program), or
- Completes a reading and/or math assessment at or below an 8th grade level, or
- Is an English language learner, or
- Is unable to compute or solve problems, or read, write or speak English at a level necessary to function on the job or in society (note: this definition is not meant to capture individuals who lack specific skills needed to function on a particular job they are seeking, but are otherwise proficient for many other occupations or situations)

Individual with Barriers to Employment – an individual who is a member of one or more of the following populations:

- Displaced homemakers;
- Low-income individuals;
- Indians, Alaska Natives, and Native Hawaiians;

- Individuals with disabilities;
- Older individuals;
- Ex-offenders;
- Homeless individuals or homeless children and youth;
- Youth who are in or have aged out of the foster care system;
- Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
- Eligible migrant and season farm workers;
- Individuals within 2 years of exhausting lifetime TANF eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.);
- Single parents (including pregnant women);
- Long-term unemployed individuals;
- Other groups that the Governor determines to have barriers to employment

Low Income - an individual who:

- An individual who receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), the Temporary Assistance for Needy Families (TANF) program, or the Supplemental Security Income (SSI) program, or State or local income-based public assistance;
- Is in a family with total family income that does not exceed the higher of –
 - The poverty line; or
 - 70 percent of the lower living standard income (LLSIL)
- Is a homeless individual, or a homeless child or youth;
- Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act;
- Is a foster child on behalf of whom State or local government payments are made; or

- Is an individual with a disability whose own income meets the income requirements of “low income” but who is a member of a family whose income does not meet this requirement.

Recipient of Public Assistance - an individual who receives or is eligible to receive one or more of the following benefits:

- Supplemental Nutrition Assistance Program (SNAP) benefits
- Medical Assistance (Minnesota’s Medicaid program)
- Refugee Assistance benefits
- Temporary Assistance for Needy Families (TANF)/Minnesota Family Investment Program (MFIP) benefits
- Other state or federal benefits requiring an income limit to be eligible

Related Links

- [DEED's WIOA Website](#)
- [WIOA Adult Acceptable Documentation List](#)



Hennepin-Carver

Workforce Development Board

WDA 09 WIOA Dislocated Worker, MN Dislocated Worker Policy: Dislocated Worker Eligibility Policy WIOA

Policy Summary

The Dislocated Worker Program offers employment and training services for eligible individuals. Eligibility determination must be made by the program operator prior to a person's enrollment in the Program. All applicants must be allowed to receive an eligibility determination. *This local policy adopts that of the MN Department of Employment & Economic Development.*

Relevant Laws, Rules, or Policies

[WIOA Section \(3\)\(15\)](#)

[WIOA Section 133 \(b\)\(2\)\(B\)](#)

[TEGL 19-16](#)

[20 CFR 1010](#)

[WIOA Final Rule](#)

[WIOA Sec. 188\(a\)\(2\) and \(5\)](#)

[20 CFR § 680.110\(c\)](#)

[WIOA Sec. 188\(a\)\(5\)](#)

[TEGL 02-14](#)

[TEN 28-16 Change 2](#)

[20 CFR 682.305](#)

[20 CFR Part 639](#)

[20 CFR § 680.130\(b\)\(3\);](#)

[20 CFR 404.1068](#)

[20 CFR § 675.300](#)

[20 CFR § 680.660](#)

Effective Date: March 18, 2026

Last Reviewed Date:

Contact: Jen Albrecht, Workforce Development Manager jen.albrecht@hennepin.us

Policy:

The Dislocated Worker Program offers employment and training services for eligible individuals. Eligibility determination¹ must be made by the program operator prior to a person's enrollment in the Program. All applicants must be allowed to receive an eligibility determination.

Individuals must meet the following criteria to be eligible:

- Eligible to work in the United States²; **and**
- Registered with Selective Service if applicable (see DEED's Selective Service Registration policy); **and**
- Meet **at least one** of the following categories:

Category 1 – Individual or Small Group Layoff³

An individual who meets the following:

1. Has been terminated or laid off, or who has received notice of termination or layoff; **and**
2.
 - i. Is eligible for or has exhausted unemployment compensation; **or**
 - ii. Has been employed long enough to demonstrate to the service provider attachment to the workforce, but is not eligible for unemployment compensation because earnings were not enough to qualify or the job from which the participant was laid off was with an employer that was not covered under a state unemployment compensation law; **and**
 - iii. Is unlikely to return to a previous industry or occupation

NOTE:

- Employment loss may be from a physical or virtual site.
- An individual does not have to be residing in MN at the time employment ends.
- An individual does not need to be employed full-time or *permanently* at the time of dislocation to be eligible. This includes individuals employed through a temporary agency contract, as a consultant, or as a seasonal worker whose employment prematurely ended due to a closure or layoff.
- Seasonal, temporary and/or contract workers whose assignments end according to a pre-determined contract end date or who reasonably anticipate returning to the same position are not considered eligible for the program because these circumstances are not considered dislocation events.
- Individuals laid off on a temporary basis, with a specific recall date to return to work for 180 days or less only (i.e., the return to work is time-limited, and the individual will be permanently laid off after that time) are still eligible under this definition. In a temporary recall, the employer still clearly intends to terminate the worker after the recall period has ended. This does not apply to seasonal workers who intend to return to the same occupation when the season work resumes on

an ongoing basis (i.e., the layoff would never be considered permanent, only seasonal).

- The previous occupation or industry relates directly to the job of dislocation, not the most recent job if the most recent job is considered interim or stopgap employment. The job of dislocation is the job that qualifies the individual under one of the dislocated worker definition eligibility categories.

Category 2 – Mass Layoff⁴ or Permanent Closure

An individual who meets **ONE** of the following:

1. Has been terminated or laid off, or has received a notice of termination or layoff, as a result of a permanent closure of, or mass layoff at, a plant, facility, or enterprise; **or**
2. Works at a site/facility at which the employer has made a general announcement that such site/facility will close within 180 days; **or**
3. Works at a site/facility at which the employer has made a general announcement that such site/facility will close, and the closure will take place in **more than 180 days or with no specific date of closure**. In this case, the individual may only receive basic career services that do not cause participation** until the scheduled closure is to occur within 180 days.

NOTE:

- **An individual described above will meet DW eligibility, but because the individual is only able to access basic career services that do not cause participation, the individual would be a reportable individual and not a program participant.
- **Once a closure date that is within 180 days is identified, the individual can begin to receive all basic career services, individualized career services, and training. The individual then becomes a DW participant and factors into performance measures.
- An individual does not need to wait until their last day of work in order to receive Dislocated Worker program services. Once the individual has been given an individual layoff letter/notice and has been determined eligible for the program, they are eligible for DW services. If a worker does not have an individual layoff letter/notice but is employed at a facility where the employer has made a general announcement of a planned closure within 180 days, the worker is also eligible for all services. If the employer has made a general announcement that does not include a specific closure date, or the closure date is more than 180 days in the future, the worker is eligible to receive basic career services only.

Category 3 – Self Employed⁵

The individual was self-employed (including employment as a farmer, a rancher, fisherman, independent contractor or consultant but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

Category 4 – Displaced Homemaker⁶

An individual who has been providing unpaid services to family members in the home **and** meets **ONE** of the following:

1. Has been dependent on the income of another family member but is no longer supported by that income; **and**
 - is unemployed or underemployed and experiencing difficulty obtaining or upgrading employment; **or**
 - Is the dependent spouse of a member of the U.S Armed Forces on active duty whose family income has been significantly reduced because of a deployment, a call or order to active duty, permanent change of station, service-connected death or disability of the service member; **and**
2. Is unemployed or underemployed and experiencing difficulty obtaining or upgrading employment.

Category 5 – Military Spouse⁷

A spouse of a member of the U.S Armed Forces on active duty, and who meets ONE of the following:

1. Has lost employment as a direct result of relocation to accommodate a permanent change in the service member's duty station; **OR**
2. Is unemployed or underemployed and having trouble obtaining or upgrading employment.

Category 6 – Separating or Separated Members of the U.S Armed Forces (including National Guard Veteran, or Armed Forces Reserves Veteran)⁸

- The individual is separating or has separated from the U.S Armed Forces with a discharge other than dishonorable **AND**
- has received a DD-214 or other documentation (see acceptable documents list) showing separation or imminent separation.

Disaster Recovery DWG Specific Eligibility Requirements

An individual eligible to receive services through a Disaster Recovery DWG must be one of the following:

1. temporarily or permanently laid off as a consequence of the disaster;
2. a dislocated worker as defined at 29 U.S.C. 3102(3)(15);
3. a long-term unemployed worker (as defined by the State); or

4. a self-employed individual who became unemployed or significantly underemployed as a result of the disaster or emergency.

Trade Adjustment Assistance Priority

Any individual receiving a notice of termination from a work site certified for Trade Adjustment Assistance is generally eligible for DW services. If a TAA-eligible customer seeks DW services, the service provider must enroll the individual so that they receive immediate services. Even if an individual is already working again, if they were laid off from a trade-certified site, is 50 or older, and is making less than his/her previous wage and no more than \$50,000, that individual would be eligible for RTAA (Reemployment Trade Adjustment Assistance) and would be eligible for co-enrollment in the Dislocated Worker program. Please see DEED's TAA policy on co-enrollment for additional detail.

Dislocated Worker Eligibility Disqualifications

1. General presumption of continuing eligibility: Unless a customer takes a specific action listed in this section, he or she remains eligible for the program until he or she completes the program, exits voluntarily (e.g., relocates and chooses not to continue participating), or exits due to circumstances beyond the customer's control (e.g., death). Providers may pre-emptively exit a customer only for the reasons stated in this policy, or after consultation with state or federal authorities.
2. Compulsory reasons for disqualifying an eligible DW customer: A service provider must immediately exit a customer if it discovers any of the following:
 - The customer no longer meets one or more of the general requirements (right to work, military special service act compliance);
 - The customer has undertaken full-time work that does not fall under a reasonable interpretation of interim/stop-gap employment or temporary recall;
 - The customer, prior to layoff, accepts a buyout package that essentially qualifies the individual as a voluntary quit (can be confirmed using UI eligibility determination where the individual would be ineligible to receive UI due to a voluntary quit);
 - The customer has provided false or intentionally misleading information that served as the basis for an eligibility determination;
 - The customer is not in training yet but has verifiably stopped a serious search for permanent, full-time work.
3. Discretionary reasons for disqualifying an eligible DW customer: A service provider may exit a customer, at its own discretion, if it determines either of the following:

- The customer presents a direct threat to the health or safety of any employees of the service provider, or any other customers present at the service provider's location;
 - The customer is uncooperative with all reasonable attempts to work with him or her on a successful transition to permanent, full-time work.
4. Documenting disqualifications: The service provider must carefully document any and all cases of disqualification.

Priority for Services

Priority of service must always be given to veterans and eligible spouses (including widows and widowers).

The priority of service must be applied at all times, not just when funding is limited. Priority of service should be determined on an individual basis.

Local service providers must have a policy outlining how the priority of service is implemented at the local level. The criteria should apply to all dislocated workers served and ensure availability of program services throughout the program year for those who meet the priority of service.

Participants who are not in a priority of service category but who are actively enrolled in a career or training service should be allowed to complete the activity. It is not expected that non-priority of service participants must give up their place to an individual who is in a priority of service category and beginning a career and/or training service if they are already enrolled and receiving services.

Individuals with Barriers to Employment (see definition below) are not included in the Dislocated Worker Priority of Service category. However, across all WIOA programs there is a focus on serving these populations. DEED encourages providers to enact local policies and processes that ensure access to quality services for Individuals with Barriers to Employment, so long as the veterans' priority of service is always in place.

Participant File Documentation

Service providers must document the individual's case file the basis for their Dislocated Worker eligibility. Official government documentation must exist in the individual's file for all general requirements (right to work, military special service act compliance, etc.). For more information on what is considered acceptable documentation for the requirements in this policy, see the "Acceptable Documentation for Program Eligibility" attached to this policy.

Providers must also adhere to all of the case management and data entry requirements outlined in DEED's Case Management and Data Entry Timeliness policies.

¹WIOA Sec. 188(a)(2) and (5); 20 CFR 680.110(c);

²WIOA Sec. 188(a)(5); TEGL 02-14; TEN 28-16 Change 2

³WIOA Sec. 3(15)(A); 20 CFR 682.305; 20 CFR Part 639

⁴WIOA Sec. 3(15)(B); 20 CFR 682.305; 20 CFR Part 639

⁵WIOA Sec. 3(15)(C); 20 CFR ? 680.130(b)(3); 20 CFR 404.1068

⁶WIOA Sec. 3(15)(D) and 3(16); 20 CFR 675.300; 10 usc 101(d)(1)

⁷WIOA Sec. 3(15)(E)

⁸20 CFR 680.660

Related Links

[Dislocated Worker and Federal Adult Programs \(DWFAP\) Terms and Definitions](#)

[Dislocated Worker Acceptable Documentation List](#)