**WIOA New Regulation Questions**

**This document is comprised of the different questions our colleges have asked regarding the new WIOA regulations and the answers we have received from the Alabama Department of Commerce Workforce Development Division ITA Payment Office**

1. **How does the reduction in the application period to four months (July – October) impact our students? What about health programs that accept to start in January and May?**

If training costs increased and that information was not updated in the ETPL during July – Oct then the student would be responsible for the difference since WIOA would only recognize the cost amount listed on the ETPL.  If there was a training program that you wanted to add and it wasn’t added during July - October, then no student could use WIOA funds for that program since it was not added on the ETPL during the 4 month timeframe.  The 4 months only involves the ETPL updating and adding programs for training providers.  If a student is WIOA eligible and the program is on the ETPL, they can begin training when the training provider schedules the enrollment.

1. **Will any programs be at risk of being removed due to the 200% of the HHS Poverty guidelines ($25,520)?**

Possibly, this will be part of the review process after the application period has closed.

1. **Will applicants be able to go to the Career Centers for information and assistance with the online application?**

Career Centers can assist applicants to complete their eligibility paperwork and enrollment into the AlabamaWorks system. The application period is for training providers not WIOA participants.

1. **Is there a process in place to communicate with the career center when a student’s contract needs to be terminated?**

The ITA form includes the case managers name and contact information.  The process will be in the memo and additional guidelines for ITA Payments.  It won’t be much different than current, if the training provider learns that a student has stopped attending, have not registered for the next semester or has completed the program, they inform the career center of the date last attended and the reason for termination, grades, job, can’t locate, graduation, etc.

1. **Now that the colleges will no longer have to complete Part II of the enrollment form, will the one-page form for enrollment from the career center be the student’s official contract?**

Yes

1. **How will the funding “for 1 program year at a time” impact operations?  For example, will new applications and contracts be required for the next year for the two-year programs – thus requiring the College to hold on posting funds and the student to be placed on hold?**

The decision to continue training will be made by the career center during the enrollment and the amendment will be processed prior to the year end.  The amended agreement will show the additional time and funds if needed and be sent to the training provider so the student can register for the following semester.

1. **Does FA need to reach out to Skills Training as to the Ready to Work prior enrollment requirement?**

**No, RTW is not an ITA Pre-Registration Activity.**

Ready to work is not a requirement required by WIOA guidelines for enrollment.  Some colleges require Ready to Work for certain Career Technical programs or strongly suggest students to obtain this certificate for job skill readiness.  This certificate is being required by some employers. (This may have changed since I have been in college system**)**

If your question is referring to the new AWSP program, you can contact Jessica Dent at 334-353-3256.

1. **As to paying for only the last four semesters of a six semester program, is there any provision if the student doesn’t have other funds to cover? How is this different from approving students in health programs only when they are admitted to the program?  WIOA did not pay for the academic courses in the past that the student took under their own means to get into the program.**

No. Under the new guidelines, when the student has 4 semesters left in the program, they can go to the career center @ 2 months prior to the next semester starting to determine eligibility for the WIOA program.  Or, students can enroll in programs that have a short certificate that transitions to the degree program, then WIOA would cover all semesters. Up to the maximum allowable cost category amount.

1. **As to paying for only the tuition and fees (in the last four semesters of a six semester program), is there any provision if the student isn’t Pell-eligible but is enrolled in a Pell-eligible program of study?**

If the student is not Pell eligible, WIOA covers the required costs. Up to the maximum allowable cost category amount.   Those that are receiving Pell funds will be required to apply those funds toward books/supplies/tools.

1. **Will ITA still pay certification and other fees prior to graduation (training provider request reimbursement)?  Even if the fees were in the first two semesters of a six semester program?**

No, the testing, certifications, & licensing will be processed through a special grant process that goes through the career center and the grants department in WDD.  No, WIOA won’t be covering the fees for the first 2 semesters of a 6 semester program because the student won’t be enrolled in WIOA during those semesters. WIOA can’t pay for costs that occur prior to the actual start date, even those that occur in prior semesters.  WIOA has covered the immunizations and medical tests that the student may get the couple of weeks prior to starting the nursing program, those costs are out of pocket and receipts are submitted after the student begins training and now would apply mostly to those enrolling in the LPN program since it is less than 4 semesters.

1. **If a student is only eligible for partial Pell and has to take out a loan to cover their cost of books and supplies, will WIOA cover the required books and supplies not covered by Pell?**

Yes, if Pell funds have been exhausted, WIOA covers the balance. Up to the maximum allowable cost category amount.

1. **Is there any update as to grandfathering in current WIOA students? After additional discussions, we feel that this would be best for the students.**

Yes, the students enrolled prior to 7/1/21 will continue under the old guidelines.

1. **Does the career center require the student to present their FAFSA student aid report to show proof of Pell funding or denial of Pell funding prior to completing a student contract?**

Yes, the amount of Pell that will be received will need to be provided to submit the ITA contract for approval or documentation stating that the student is not receiving any Pell awards.

1. **Is WIOA applied as first dollar or last? See examples below:**

**Books:** Student has Pell and Loans and must utilize both to get their books in bookstore because book charges exceed Pell amount. Does WIOA then cover the amount that exceeded Pell and was covered by Loans?

Once Pell is exhausted, WIOA will cover the difference. Up to the maximum allowable cost category amount.

**Example:**  Student has $500 Pell and $500 Loan with book charges totaling $600. Will WIOA cover the $100 difference between Pell and book cost? Are loan funds are exempted?

Yes, WIOA is not including student loans, just Pell funds.

1. **Pell books are taxed. WIOA books are not taxed. There are separate book detail codes for taxable and non-taxable books. If student uses Pell for books and then WIOA must pick up some remainder of books, we will have to manually adjust the student account so that it does not appear as if WIOA paid taxed book charges. Should WIOA exclude tax amounts when calculating balances?**

WIOA is tax exempt and does not pay tax on book, supplies, tool purchases.

1. **With regard to scholarship funds, is WIOA applied first dollar or last? Many scholarships are non-refundable and are use-it-or-lose-it.**

**Example**: If a student has 9 required hours that WIOA will cover ($1486) and 3 remedial/retake hours that WIOA will not cover ($492), do I first assume that the scholarship pays the tuition for the 3 remedial/retake hours first? Then WIOA would cover any remaining balance of tuition and required books? Or should scholarships be applied first to the 9 required hours and the student utilize other funds or cash to pay the balance remaining due to the remedial/retake hours?

WIOA can pay a max of $1486 for tuition; does scholarship funds reduce that amount first or is it applied to the $492 remedial/retake class first?

If the student has a scholarship that is a use or lose it, I suggest they use the scholarship first, WIOA second.  WIOA training time can be extended when needed so if they use the scholarship funds one semester and then WIOA the next the ITA contract can be amended to extend the length of training.  Also, if for some reason the student fails a class, if WIOA paid for that class WIOA would not pay for the re-take but if they fail the class under the scholarship WIOA could then pay for the re-take.   The student can use the scholarship for the remedial/pre-requisites etc. and WIOA for required classes if there is not enough scholarship to cover the entire enrollment.  If there is time limit on the scholarship, it should be used first.

1. **If a student has Pell, Pell should cover the tool charge unless exhausted and then WIOA would cover the remaining balance on tools? But WIOA will cover 100% tool charge for students with no Pell?**

Yes.  The student will be informed that they will be responsible for purchasing their tools if they receive Pell funds.  The amount of Pell award will be known and if they are receiving enough Pell funds to cover the tool and book costs, then WIOA should not be involved with tool reimbursement.

**Tool example:** Cash paying and Pell funded students purchase their own tools (literal tools for Advanced Manufacturing degrees) out-of-pocket from any source they choose. They don’t even have to purchase them if they have some or know someone that will let them borrow. WIOA students are purchased by the college by PO. This presents a problem for accounting because most WIOA covered tools are ordered by the school by purchase order and the student signs for them when they pick them up. I then enter the total on the student account and send an invoice to WIOA for the tool charge. This may be after the Pell overages have been refunded to the student. If the student must use Pell funds, I will be forced to enter the expected charge on the student account before Pell is refunded. The problem is that there have been instances where the tools were ordered, but came in at a different cost or some items left out, causing the total charge to be different than expected. That is why tool invoices are usually sent in to WIOA later in the semester. I can put them on early, but it could result in the student owing a balance after the actual cost is determined.

Once the amount of Pell award is known, the accounting and bookstores should know how to handle each students purchasing arrangement.  Full Pell award – student covers the cost, partial Pell award – student should apply up to that amount at the bookstore to cover costs, no Pell award – WIOA covers the costs as usual. Also, the student will be counselled by the Career Center on purchasing and Pell funds.

1. **Students are able to purchase computers, backpacks and other items with Pell and loan funds that WIOA does not cover. If student utilizes those funds to purchase those items in bookstore and amount exceeds Pell funding, does WIOA cover that balance? Does the Pell apply to the computer first or do we assume that Pell must be applied first to required books and supplies and WIOA will only pay any balance for required items.  Their loan funds would then cover the computer, backpack and other items.**

**Example:** Student has $500 Pell and $500 loan with book charges $600 and computer $300 for $900 total. Will WIOA cover $100 difference between books and Pell or $400 difference between Pell and total charges?

If book charges are $600 and the student receives $500 in Pell, then WIOA will cover the $100 difference.  The student will need to use the $500 loan to purchase the laptop.  For WIOA to cover the costs once Pell is exhausted, Pell funds will need to be applied to WIOA eligible items, not items that are not WIOA eligible like laptops, bookbags, etc.

**Remedial/Retakes:**

1. **If a student has 9 required hours that WIOA will cover and 3 remedial/retake hours that WIOA will not cover, and utilizes Pell and loan in the bookstore, do I first assume that Pell pays the tuition for the 3 remedial/retake hours before paying the books? Then WIOA would cover any remaining balance of required books? Or should Pell be applied first to the 9 required hours and the student utilize other funds or cash to pay the balance remaining due to the remedial/retake hours?**

**Example:** $1486 for required classes, $492 for retake, total tuition and fees $1978. Has $500 Pell. Uses Pell in bookstore for $400 required books and $100 retake book. Does Pell first cover $492 retake tuition + $8 retake book, leaving student to pay $92 out-of-pocket for retake book and WIOA pay $1486 tuition + $400 required books? Or, does Pell pay first to $400 required books and WIOA pay $1486 tuition and student left with $100 Pell to pay towards the $492 retake and $100 retake book, leaving student to pay remaining $492 balance out-of-pocket?

The student will be responsible for the remedial/retake classes by using their Pell funds or loan funds.  Normally, these classes are taken in a sperate semester not with the required classes that WIOA would pay for because to continue in training, they would normally have needed to complete the remedial and retakes before continuing in the training.  But, if by some circumstance that both are taken together, the student should use Pell funds or loan funds on what WIOA will not pay, which would be the remedial and retake costs.

1. **A student is enrolled in 12 credit hours for the fall semester. 9 hours are WIOA eligible coursework and 3 hours of repeat coursework (not WIOA eligible). The student receives a full Pell. Can the student use their Pell to cover the 3 credit hours not covered by WIOA and then request reimbursement from WIOA for their books and supplies for the WIOA eligible courses?**

Yes and if they have Pell funds left over from the repeat coursework, they will need to apply the remainder of the Pell funds toward the books and supplies from the enrollment of the WIOA eligible coursework

**Nursing/Reimbursement Questions:**

1. **Will all NCLEX and licensing reimbursements be managed through the career center regardless of when the student paid for them? Some students register and pay before the graduation date and some wait until after because they are waiting to see if they actually passed the last semester.**

 Yes, all after graduation testing and licensing reimbursement must go through the Career Center no matter when they are purchased.

1. **Will there be any reimbursements by the training provider to the student at all? What about the required Swift River software used each semester during the nursing program or the Live Review that is required in the last semester of nursing? All students must purchase these online and usually, WIOA students forward to me their payment emails to submit for reimbursement.  Still reimbursable?**

Yes, those occur during the semester as part of the training.  The testing and licensing occurs after training is completed.

1. **I have also had students to purchase their books from outside sources and submit the receipts for reimbursement; will this be allowed?**

Yes, you will still apply the same Pell fund requirements if they are receiving Pell funding.

**Question: RN vs LPN**

1. **Previously, most of the nursing students taking NUR 112 in their first semester of nursing school have to purchase required nursing uniforms, equipment, medical immunizations, background checks, etc. The students would pay out-of-pocket and then submitted receipts for reimbursement. The RN program is 5 semesters, with the first-year nursing book charge (which costs over $1200 and covers the first 3 semesters), uniforms, equipment, medical fees, etc. all occurring in the first semester. Does this mean that RN students must cover these costs themselves or with Pell funds?**

Yes, those costs occur in the first semester and since WIOA is picking up the last 4 semesters up to the maximum allowable cost category amount, the student will be required to cover those expenditures themselves.

1. **The LPN program is 3 semesters, with the first year nursing book charge (which costs over $1200 and covers the first 3 semesters), uniforms, equipment, medical fees, etc. all occurring in the first semester. Does this mean that LPN students will have these costs covered if they do not have Pell funds?**

Yes, if they enroll in the LPN program and have no Pell funds, WIOA would cover all required costs. Up to the maximum $10,500 for LPN.

1. **In regards to all RN degree seeking students, previously WIOA would only pick up nursing contracts once the student had been admitted to the nursing program. Most of these students have already taken at least 2 semesters of (required) general core classes to attain the credentials needed to enter the program. Will these semesters be considered when issuing a contract for nursing? The same will apply to Dental Assisting, Medical Laboratory Technician, Physical Therapy Assistant and Surgical Technology students; all must be admitted to their programs with certain credentials.**

If the program is longer than 4 semesters, then the student must complete those semesters prior to beginning training under WIOA.  WIOA will cover the last 4 semesters of a program up to the maximum allowable cost category amount.