

INTERNAL MEMORANDUM (DWDB Policy 2017006)

FOR: DOL-DET Management Team, DWDB Staff

FROM: Executive Director, Delaware Workforce Investment Board (DWDB)

DATE: July 18, 2017

SUBJECT: Rescission of DWDB Policy #2016001 (PRAF) and Establishment of an Expedited Provider Approval Process

References. Federal Register /Vol 81, No. 161/ Friday, August 19 2016, Part VI, Department of Labor, Employment and Training Administration, 20 CFR Parts 680.430 Workforce Innovation and Opportunity Act; Final Rule.

DWDB Policy 2017002, Executive Director Authority to Approve Occupations to Delaware's Eligible Training Provider List between Meetings

- 1. Purpose.** This memo officially and immediately rescinds the Provider Recruitment Adjustment Form (PRAF) and institutes an Expedited Provider Approval Process.
- 2. Background.** The PRAF was established to provide flexibility to clients and staff by allowing programs to be added to the ETPL for a temporary "trial" period. This program also gave the DWDB the chance to recruit programs it might not otherwise consider. Moreover, the PRAF was instituted to quickly provide higher credentialed dislocated workers an opportunity to access training more in keeping with their experience (e.g. scientist receiving additional certifications to increase marketability). Unfortunately, after additional research this approach of a "temporary" trial period appears to be in violation of Federal Register /Vol 81, No. 161/ Friday, August 19 2016, Part VI, Department of Labor, Employment and Training Administration, 20 CFR Parts 680.430, which requires all providers to be an Eligible Training Provider (ETP) to access training funds. It is important to note, the Executive Committee of the DWDB on July 13, 2017 authorized the Executive Director to approve programs and providers to the Eligible Training Provider List (ETPL).
- 3. Expedited Provider Approval.** Because the Executive Director has the authority to approved programs and providers between board meetings, there is no need to wait for a quarter to include new providers to the ETPL, thus cutting down on the "turnaround time" from when new providers/programs are identified and approved. To ensure

regulatory and state policy compliance providers will complete all forms and meet all requirements for inclusion on the ETPL.

a. DOL-DET Tasks. DOL-DET will develop an internal policy that alerts the DWDB staff of the potential new provider. The old PRAF form would probably be fine.

b. DWDB Tasks. The DWDB has 21 days to complete every step of the Initial Eligibility Process with the prospective provider. The DWDB Executive Director will report the approval or disapproval to the DWDB.

4. I am the point of contact at 302-761-8163 or William.potter@state.de.us.

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