

# NASWA SURVEY ON PELL GRANTS AND APPROVED TRAINING FOR UI

## SUMMARY AND STATE-BY-STATE RESULTS

FINAL: 3/22/2010

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## NASWA Survey on Approved Training and Pell Grants for UI Claimants

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## NASWA Survey on Approved Training and Pell Grants for UI Claimants

### --Some Preliminary Results--

#### States' Definitions of "Approved Training"

- Of 50 states reporting, 20 (or 40 percent) reported expanding the definition of "approved training" through law or interpretation since the Recovery Act.

Examples:

"Our policy on approved training has expanded to include college-level courses in degree programs and other courses not listed on the eligible training provider list which are expected to improve the UI customer's long-term employability in growing industries."

"We now allow all WIA training to be considered approved training."

"By policy interpretation we have extended eligibility for benefits to claimants who take advantage of the Pell Grant resources to further their education, and we allow WIA-approved training at the commissioner's discretion."

- Prior to the Recovery Act, 42 of 49 states (86 percent) automatically considered WIA training "approved training" under the UI program. Since the Recovery Act, the number has grown to 45 (92 percent).
- 30 of 49 states (61 percent) currently allow some 4-year post-secondary programs as "approved training" under UI, up from 26 states (53 percent) before the Recovery Act.
- Prior the Recovery Act, 28 of 49 states (57 percent) allowed academic courses not leading to a specific occupation as "approved training." Since the Recovery Act, the number has grown to 30 (61 percent).
- 20 of 49 states (41 percent) currently have a state-imposed time limit for completing training (down 1 since the Recovery Act).
- In 40 states (80 percent), out-of-state training can be considered "approved training."
- 47 of 49 states (96 percent) allow community college programs with job skills components as "approved training."
- 38 of 49 states (78 percent) allow community college GED courses as "approved training."
- 40 of 49 states (82 percent) allow community college ABE courses as "approved training."

- 36 of 49 states (73 percent) allow ESL courses at community colleges as “approved training.”
- 42 of 48 states (88 percent) allow other community college courses (including degree and certificate programs) likely to increase long-term employability as “approved training.”

#### States’ Responses to Administration’s Pell Grant Initiative

- 39 of 49 states (80 percent) reported sending Pell Grant letters to claimants. One additional state was about to send out letters, and four other states wrote they provided the information in a different format. Of the remaining 5 states, 1 state reported current workloads prohibited sending the letter, 3 reported current UI policies on degree track programs were inconsistent with the Pell Grant initiative, and 1 reported an insolvent trust fund prohibited a benefit expansion.
- Few states measured response rates, but roughly 10 states reported a heavy response.
- The types of actions states took to implement the initiative included: partnering with higher education to provide workshops; bringing in community college personnel to give staff and customers a better understanding of the Pell Grant process; hosting a special phone line to answer general questions regarding school attendance and UI; hosting a designated training session for local UI staff; contracting with a nonprofit to provide workshops and Pell Grants and financial aid through the Career One-Stops; phasing the mailing of letters.
- Feedback included suggestions to craft the letter to make it clear that no additional UI benefits would be received as a result of training, and no financial aid was guaranteed as a result of the letter; suggestions the letter was too general and did not include enough substance; and suggestions to stagger mailings.
- One state with a significant response noted colleges were not prepared for the inquiries they received, and did not have the slots available. States were not asked directly about this.

State	Definition of "approved training" changed since the RA?	<p style="text-align: center;"><b>Chart 1. Definitions of "Approved Training" under State UI Programs and Policies (Post-Recovery Act)</b></p>
Alabama	No	No otherwise eligible individual shall be denied benefits for any week because he or she is enrolled in a course of training with the approval of the director. Such approval shall be conditioned upon the following: 1. the individual's skills are obsolete or such that there are minimal opportunities for employment; 2. training is for an occupation for which there is a substantial and recurring demand; 3. training is not a course of education for credit toward a degree.
Alaska	No	WIA-sponsored training, as well as other State- or federally-sponsored training, is automatically approved under Alaska's regular UI program. Training can be either vocational or academic. Other training may be approved if it is vocational in nature, the claimant needs the training, and the claimant did not leave skilled work to attend the training.
Arizona	No	WIA-approved training is automatically considered approved training for UI. Otherwise, occupational training or other training likely to increase the individual's long-term employability, but only if demand for the individual's last job has substantially diminished and the individual's skills are in need of upgrading due to technological or other advances. In each case, training must be approved by an adjudicator. Training is limited to 52 weeks. Training must be full time at an academic institution or must entail at least 20 hrs of supervised participation at a non-academic (vocational) institution.
Arkansas	No	1.GED courses 2.TAA Training 3.WIA Training 4.Bachelor's degrees than can be completed in two years or less 5.Training not on the demand occupation list when the claimant provides a letter from a potential employer of intent to hire the claimant upon completion of training.
California	Yes	Training which is authorized by WIA, TRA, California's Employment and Training Program (ETP) or the California Work Opportunity and Responsibilities to Kids (CalWORKS) program have automatic approval for UI by statute. Training that is self-arranged can also be approved if the individual has been unemployed for at least four weeks or due to technological advances, company closures or health; skills are needed to improve employability and opportunities exist for the training occupation, both supported by labor market demands; it's been three or more years since the last period of "approved training"; the training is full-time and limited to 12 months, and not intended solely for a degree.
Colorado	No	WIA-approved training is automatically considered approved training for UI. Occupational or other training that is likely to increase a claimant's long-term employability must be approved by the local workforce center. A claimant's current skills as well as demand for the individual's last job are considered when determining whether to approve the training program.
Connecticut	No	WIA- and TRA-funded training are automatically considered approved training for UI. Other training may be approved on a case-by-case basis.
DC	No	The five occupational areas are: Information Technology, Allied Health, Weatherization, Automotive Technology, Commercial Driver's License.
Delaware	Yes	Under current state unemployment law, approved training is for claimants whose current qualifications/training are not in an area where opportunities are readily available in the local area and the claimant must be entering a vocational training course that will increase the individual's chances of obtaining sustainable employment into the future.

<b>Florida</b>	No	FL's administrative rule relating to determinations of approved training: Approved training includes training authorized by Workforce Florida, Inc., a Regional Workforce Board, or Workforce Investment Board created pursuant to the Workforce Investment Act. The Agency shall not approve training unless: (a) the claimant possesses aptitude and skills that can be usefully supplemented by the training; and (b) the labor market demands for the claimant's present skills are minimal; (c) the training is a vocational, technical, intern, managerial, high school equivalency or academic program designed to prepare individuals for gainful employment; (d) a reasonable expectation exists that the claimant will be employable upon completing the training; and (e) the training course or school is approved by the Florida Department of Education or other official governmental approving agency within the state where the training is being conducted. To be eligible for benefits during a week of approved training, the claimant must: (a) furnish attendance reports when requested by the Agency; and (b) attend the scheduled training sessions(s). Unsatisfactory attendance may result in withdrawal of Agency approval of the training.
<b>Georgia</b>	No	WIA-approved training is automatically approved training for UI in Georgia. Georgia UI policies also approve training that will allow an upgrade of potential skills to increase employability which includes completion of an academic degree. Training must be offered by an approved training facility, in a supervised environment on a fulltime basis commensurate with the requirements of the training provider. The training may be for academic, vocation, or basic/remedial learning. On the job training (OJT) may be approved if the claimant is training in a position that will lead to gainful employment.
<b>Idaho</b>	Yes	No claimant who is otherwise eligible shall be denied benefits if: (a) the claimant is a participant in a WIA-Adult or WIA-DW sponsored program and attends a job training course under that program; (b) the claimant attends a job training course authorized pursuant to the provisions of section 236(a)(1) of the trade act of 1974 or the North American free trade agreement implementation act; or (c) the claimant lacks skills to compete in the labor market and attends a job training course with the approval of the director. The director may approve job training courses that meet the following criteria: (i) the purpose of the job training is to teach the claimant skills that will enhance the claimant's opportunities for employment; and (ii) the job training can be completed within one (1) year, except that this requirement may be waived pursuant to rules that the director may prescribe. The claimant must submit with each claim report a written certification from the training facility that the claimant is attending and satisfactorily completing the job training course. If the claimant fails to attend or otherwise participate in the job training course, it must be determined whether the claimant is able to work and available for suitable work.
<b>Illinois</b>	No	WIA-approved training is considered approved training for UI purposes. If Director-approved training, it must be vocational, it must facilitate reemployment, it must focus on securing an entry-level position, it must be at least 12 hours per week, and work opportunities must exist.
<b>Indiana</b>	No	In Indiana, approved training comprises enrollment in an Adult Basic Education program, as well as pre-baccalaureate, occupational training that leads to an Associate's degree or nationally-recognized certificate in high-wage or high-demand fields. Baccalaureate or post-baccalaureate study are also considered approved training.
<b>Iowa</b>	No	Iowa has a broad definition which includes any training which will enhance the employability of the individual or enhance employment skills. This includes apprenticeship, vocational, college, and employment search skills training.
<b>Kansas</b>	No	WIA-approved training is automatically considered approved training for UI. Other training that may be approved includes any vocational course or course in basic education approved by the Secretary or his designee. The training must be shown to enhance the claimant's prospects of finding work.
<b>Kentucky</b>	Yes	State still requires training approval. Recommended WIA training is approved without additional scrutiny. Training is emphasized during all UI sessions.
<b>Louisiana</b>	No	Approved training is training to which an individual has been referred by the Administrator of the LA Workforce Commission. Referral will be made to vocational training, basic education or other short term vocationally directed academic courses designed to develop a particular skill. WIA-approved training is automatically considered approved training for UI. Approval will be given to courses approved by the LA Department of Education which are designed to make the individual employable or more employable in an occupation that is in demand and there is reasonable expectation the individual will be employed upon completion, except no approval will be given to any training course primarily for credit toward the degree requirements of baccalaureate or advanced degree and no approval will be given to a training course which will take longer than 104 weeks to complete.

<b>Maine</b>	Yes	There are three ways in which a person can obtain approved training status in Maine: 1) participation in WIA-approved training, 2) participation in the Maine Competitive Skills Scholarship Program, or 3) approval from the Unemployment Insurance Commission (higher appeal authority). This third process looks at occupational training for jobs that are stable or subject to growth based on local economic assessment and whether the training will likely increase the individual's long-term employability. In addition to individual claimant requests, the Commission will also entertain training provider requests for one-year blanket approval of a training provider or specific courses.
<b>Maryland</b>	No	WIA-approved training is automatically considered approved training for UI. Otherwise, occupational training OR other training 'likely to increase the individual's long-term employability' BUT ONLY IF demand for the individual's last job has substantially diminished AND the individual's skills are in need of upgrading due to technological or other advances. In each case, training must be approved by an agency representative. Training is limited to 12 months.
<b>Massachusetts</b>	Yes	Individuals who are permanently separated may be approved for full-time vocational or academic training. Full-time training programs (including all 'WIA-approved programs, ABE, and ESL programs) that meet required placement standards may be approved.
<b>Michigan</b>	Yes	Training is approved when reasonable opportunities for employment in occupations for which the individual is suited by training and experience do not exist in the locality in which the individual is claiming benefits. The vocational training course must be related to an occupation or skill for which there are, or are expected to be in the immediate future, reasonable employment opportunities. The vocational training must have been approved by the local Workforce Development Board. The individual must have the required qualifications and aptitudes to complete the course successfully. The vocational training course must have been approved by the State Board of Education and maintained by a public or private school or by the State Bureau of Workforce Transformation (BWT).
<b>Minnesota</b>	No	An applicant is in "reemployment assistance training" when: (1) a reasonable opportunity for suitable employment for the applicant does not exist in the labor market area and additional training will assist the applicant in obtaining suitable employment; (2) the curriculum, facilities, staff, and other essentials are adequate to achieve the training objective; (3) the training is vocational or short term academic training directed to an occupation or skill that will substantially enhance the employment opportunities available to the applicant in the applicant's labor market area; (4) the training course is considered full time by the training provider; and (5) the applicant is making satisfactory progress in the training. Full-time training provided through the dislocated worker program, the Trade Act of 1974, as amended, or the North American Free Trade Agreement is considered "reemployment assistance training," if that training course is in accordance with the requirements of that program. Apprenticeship training provided in order to meet the requirements of an apprenticeship program under chapter 178 is considered "reemployment assistance training."
<b>Mississippi</b>	No	MS has a comprehensive list of training courses / training providers that are "approved" for UI. Individuals not in an "approved" training program must be available for full-time employment.
<b>Missouri</b>	Yes	WIA and Trade approved training are automatically approved training for UI. Employees who are part of a mass layoff (5 or more persons) can also be automatically approved if they are enrolled in training. The Director can approve training courses if it is found that: (1) reasonable employment opportunities for which the unemployed claimant is fitted by training and experience do not exist or have substantially diminished in the labor market area in the state in which he is claiming benefits; (2) the retraining course of instruction relates to an occupation or skill for which there are, or are expected to be in the immediate future, reasonable employment opportunities in any labor market area in the state in which the claimant agrees to seek work; (3) the retraining course of instruction is one prescribed by the director; (4) the individual has the required qualifications and aptitudes to complete the course successfully and profit therefrom; and (5) upon completion of his retraining course of instruction the individual should be qualified to use the skills acquired under labor organization rules where applicable to such skills.
<b>Montana</b>	Yes	MT is approving training very liberally. The claimant just has to show the training will enhance their employability, provide more stable employment, or increase their earning power. Their new career must be in an occupation that is or will be in demand. We have not made any law changes regarding approved training but we might end up with a new rule. Currently we are interpreting our current law and rules more liberally.

<b>Nebraska</b>	No	WIA-approved training is always approved for payment-approved training. Payment-approved training is granted for vocational and occupational training when reasonable employment opportunities for which the claimant is qualified do not exist in the labor market to which the claimant is attached and the training will qualify the claimant for work which exists in the labor market. Training intended to lead to a degree is not approved.
<b>Nevada</b>	No	NAC612.190 specifies that training be approved if it is sponsored by the Department of Labor, including state agencies which fall under the authority of the DOL (when approved training meets this condition, the length of training can exceed 6 months duration). If it is not approved or financed by the DOL, training will be approved if: a) it does not exceed six months duration and is given specifically to provide the trainee with skills to become re-employed; b) there is a market for the required skills in the area of the trainee's residence; c) the training is given by an institution or facility approved by and in good standing with the State of Nevada Dept of Education or Vocational Rehabilitation. Work search requirements should be waived only when the person's approved training schedule would otherwise place a restriction on his availability. The following are some examples of approved training: training paid under WIA by Nevada Business Services or Nevada Partners; CEP classes; Vocational Rehabilitation; Union Apprenticeship Training; TAA.
<b>New Mexico</b>	No	All WIA-approved training is automatically considered approved training for UI.
<b>New Hampshire</b>	No	There are no automatic approvals. To be approved, the request for approval of training must be received prior to the start of training. The training curriculum must be approved by the NH Department of Education. The program of instruction must relate to an occupation or skill for which there is a demand. Employment opportunities for which the individual is fitted by past training and experience must not exist or have substantially diminished. The individual must possess the aptitude, ability and educational level to satisfactorily complete the training. The training must be through an organized program offering a course or a sequence of courses designed to prepare an individual for gainful employment requiring other than a baccalaureate or higher degree.
<b>New York</b>	No	If training has been approved under TAA, it is approved training for UI. If training has been approved under other federal funding streams such as WIA, Vocational Rehabilitation Act or TANF, it is approved if it requires attendance for at least 12 hours or 12 credit hours each week and will not require more than 24 months to complete. Otherwise, occupational or other training must: (1) meet the 12 hour minimum, (2) not require more than 24 months to complete, (3) be offered by a competent training provider (on ETP, State Education Dept list, or approved under accrediting entity accepted by USDOE), and (4) relate to occupation or skill for which there are expected employment opportunities. Additionally, there must be a need for the training (to upgrade skills, train for an occupation likely to lead to more regular long-term employment or because employment opportunities for the claimant are substantially impaired); and the claimant must have the required qualifications and aptitudes to complete the training.  Approved training can include occupational or educational training. GED and ESL training are approvable as stand alones if that is all customer needs, or bundled with occupational training. Individuals can complete higher degree training (e.g., Bachelors, Masters) if it meets criteria outlined above (including time limit). Online training may be approvable.
<b>North Carolina</b>	No	WIA-approved training and Agency Commission-approved training are automatically approved. Specialized training is approved on an individual basis.
<b>North Dakota</b>	No	WIA-approved training is automatically considered approved-training for UI. Other training may also be considered if it meets the following conditions: 1. reasonable and suitable work opportunities for which the individual is fitted by training, experience, and physical capabilities do not exist in the individual's locality; 2. the training course is commensurate with the individual's abilities and is designed to prepare the individual for available employment; 3. the training is conducted by an agency, educational institution, or employing unit which has been approved for such training by the bureau in consultation with the state department of vocational education, when necessary, to conduct training programs; and 4. the training is vocational in nature or is short-term academic training vocationally directed to an occupation or skill for which there are, or are expected to be, reasonable work opportunities available to the individual.
<b>Ohio</b>	Yes	Training approved through WIA, TAA, and the Bureau of Vocational Rehabilitation is automatically approved. Joint apprenticeship training is approved. Technical and vocational training are highly likely to be approved. Ohio had approximately 7,000 courses listed that could be considered as approved. Academic training approved on a case-by-case basis until new policy developed.
<b>Oklahoma</b>	Yes	WIA-approved training is automatically considered approved training for UI. Training approved by local office managers is considered approved training for UI.
<b>Oregon</b>	Yes	Training Unemployment Insurance (TUI) - Training for eligible dislocated workers where approved claimants can collect UI benefits without having to actively seek work. They can qualify for up to 26 additional weeks of Supplemental UI for Dislocated Workers (SUD).



<b>Pennsylvania</b>	Yes	PA broadened its definition of approved training. Here are the current guidelines: Any training the claimant receives that is likely to increase the claimant's long-term employability will be considered approved training. Examples of approved training are: programs with job skill components; courses leading to general equivalency degrees, or GEDs; courses in adult basic education; language courses; or other courses of study that develop job skills, including degree and certificate programs. These types of programs are available at: community colleges; public and private institutions of higher education; career and technical education centers; apprenticeship and training programs; education/training offered by Ben Franklin Partnership, the PA Manufacturers' Association, Industrial Resource Centers and other regional organizations; other industry associations offering education/training meeting current industry standards; education/training offered through Pennsylvania's Industry Partnerships; and online web-based training programs.
<b>Puerto Rico</b>	No	WIA-approved training is automatically considered approved training for UI. There are no special conditions for the worker to meet except for the WIA eligibility requirements for the program. Training providers are required to be certified and accredited by the state in order to provide training funded with federal funds. Training is approved by the Bureau of Employment Security Director.
<b>Rhode Island</b>	Yes	UI recipients attending a course listed on our WIA Eligible Training Provider List are automatically approved. All other training requires approval by Workforce Development staff based on the customer's aptitude, expected employability in the field of study, etc. College-level courses and degree programs were not traditionally approved to waive work search requirements, but policy was just expanded to include college-level courses in degree programs and other courses not listed on the eligible training provider list which are expected to improve the UI customer's long-term employability in growing industries.
<b>South Carolina</b>	No	In South Carolina, WIA-approved training is automatically considered approved training for UI. We also consider trainees in the Vocational Rehabilitation program to be in approved training for UI. We look at the length of the training and training curriculum to decide if other designated training will be considered approved training for UI.
<b>South Dakota</b>	No	State laws and rules provide clarity for approved training under the regular UI program. Approved training is limited to training under the Workforce Investment Act; or programs of instruction in vocational training or in basic education or employment skills. An individual in approved training must be principally occupied as a student and be able to complete the program in 24 months or less. The state must find that the training is in an occupation or skill for which there are, or are expected to be upon completion of the training, employment opportunities in the area where the individual intends to seek work; and that the individual has aptitudes or skills which can be usefully supplemented by retraining.
<b>Tennessee</b>	No	Training approval shall be considered if the individual has experienced an indefinite separation from employment. Training approval shall be limited to: A) training secured by an individual in an institution which is licensed by the state and/or accredited and/or authorized to provide a diploma/certificate of completion of occupational training programs; and training that consists of an established curriculum which is of a duration that is determined by such institution as reasonable to complete the program; and training in which the claimant is qualified to participate; and training as may reasonably be expected to improve the claimant's existing occupational skills, or offer new skills and increased opportunities for obtaining employment; or B) training secured for an individual and/or approved under the Families First Program, WIA, TAA or other federal law which provides occupational retraining or remedial education, whether or not administered by the workforce agency. The receipt of financial assistance for training or education under federal or state grants or student loan programs does not constitute an approved training program unless the training meets all other criteria for approval and has been approved.
<b>Texas</b>	Yes	Any training provided through the Veterans Administration, the Texas Department of Assistance and Rehabilitative Services, and the Texas Department on Aging and Disabled is automatically considered approved training for UI. In addition, WIA and Trade-approved training is automatically considered approved training for UI. Claimants may be referred to a local workforce center, and local workforce center staff determine if the claimant is unable to secure employment based on their occupational history and a review of existing jobs in the state's job matching system, WorkInTexas.com. If they are unable to return to work, local workforce center staff may authorize them to participate in approved training. Approved training is limited to targeted occupations, either from the state's targeted occupations list, or the Board's targeted occupations list. This training may be funded with WIA (based on funds availability), by Pell Grants, or by any other funding source.
<b>Utah</b>	Yes	WIA-approved training is automatically considered approved training. The claimant must have a reasonable expectation for success as demonstrated by having the aptitude and interest for the training and sufficient time and resources to complete the training. An institution approved by the Department must provide the training. The training is not available except in school. There is a reasonable expectation of employment following the completion of the training. The claimant did not leave work to attend school. The schooling is full-time, as defined by the training facility.
<b>Vermont</b>	Yes	WIA approved training is automatically considered, as well as training focused on high demand occupations.

<b>Virginia</b>	No	WIA and TAA training are automatically approved for UI. Commission-approved training is available for vocational or technical training or retraining in schools or classes that are conducted as programs designed to prepare an individual for gainful employment in the occupation for which training is applicable. The training course shall require a minimum of 30 hours attendance each week.
<b>Washington</b>	Yes	TRA/TAA training is automatically approved. We have three main programs a claimant could be approved for when attending training, Commissioner Approved Training (CAT), Self-Employment Assistance Program (SEAP), and Training Benefits. CAT is for individuals laid off due to technological advances or who show that they are unlikely to return to the work in which they have experience or skills because of illness, injury or other unique individual circumstances. SEAP allows unemployed individuals to train and create new businesses and job opportunities. Unemployment insurance (UI) claimants identified as likely to exhaust their regular UI benefits can enroll in approved programs for self-employment training while continuing to receive their unemployment benefits. Training Benefits is the third, and it allows those eligible for the program to extend their unemployment benefits while training for careers in high-demand fields. Training benefits are additional unemployment benefits that can pay up to 52 times unemployment weekly benefit amount minus any regular benefits paid. Generally training needs to be full time; Training Benefits has an option to consider those who may qualify for less than full time training.
<b>West Virginia</b>	Yes	WV Code Section 21A-6-4 states that no individual shall be denied unemployment compensation benefits because of his receiving training as part of an area vocational program, or similar program, which has as its object the training of unemployed individuals in new occupational skills: Provided that such individual's training and the training institution are approved by the Commissioner and such individual produces evidence of his continued attendance and satisfactory progress at such training when requested to do so by the commissioner. By policy interpretation we have extended eligibility for benefits to claimants who take advantage of the Pell Grant resources to further their education and we allow WIA approved training at the commissioners discretion.
<b>Wisconsin</b>	Yes	Training approved by TAA, WIA, or a program administered by the department is considered approved training. Also, full-time vocational training is considered approved training if it does not grant substantial credit toward a bachelor's or higher degree, and is expected to increase the opportunity to obtain employment, and if the individual is making satisfactory progress in the training.
<b>Wyoming</b>	No	Training approved under federal law is automatically approved. Other training must be to prepare for entry level or upgraded employment in a recognized occupation. Current skills must be obsolete or offer minimal employment opportunities.
<b>Total # States</b>	50	
<b>Total "Yes"</b>	20	
<b>Total "No"</b>	30	

**Chart 2. States Explain How Their Definitions of "Approved Training" Have Changed Since the Recovery Act....**

Alabama	No change.
Alaska	No change.
Arizona	No change.
Arkansas	No change.
California	A directive was issued to staff advising the following considerations for "approved training": "When California Training Benefit Program eligibility is based on meeting the criteria of California Unemployment Insurance Code (CUIC) Section 1269(d) (self-arranged school or training), staff evaluate the labor market demand for current job skills/occupations and the training occupation. Claimants who were laid off from their last employment and have been unemployed for extended periods while actively seeking work, especially during a recession, meet the test for the "lack of labor market demand" as provided in CUIC 1269(d)(2) and need to be given serious consideration for CTB."
Colorado	No change.
Connecticut	No change.
DC	No change.
Delaware	There have been some changes in allowable conditions for approved training since the enactment of the Recovery Act. The changes have been made by interpretation and not through any changes in our existing law. There has been a broadening of the definition of the word "vocational" to allow for certificate programs and in some instances bachelor's degree programs.
Florida	No change.
Georgia	No change.
Idaho	Idaho has broadened its interpretation of "approved training" through policy interpretation, allowing more claimants to participate in training while receiving UI benefits.
Illinois	No change.
Indiana	No change.
Iowa	No change. But Iowa has a broad definition which included all training prior to ARRA.
Kansas	No change.
Kentucky	State has not had to change law but has changed procedures to encourage training for UI claimants. WIA training automatically approved.
Louisiana	No change. However, legislation will be proposed this year to broaden the definition to allow degree-oriented college courses.
Maine	The Unemployment Insurance Commission issued a one-year blanket approval for all courses and or providers on the WIA approved training list which greatly streamlined and shortened the training approval process for most participants. The blanket approval will be reconsidered for continuation at the end of one-year.
Maryland	No change.

Massachusetts	By regulation, the 15-week application deadline has been tolled while extended benefits are in place. Individuals unable to work in their regular occupation due to a disability were added to the list of specifically approvable applicants which includes those with obsolete skills and those for whose skills there is no demand. Maximum program duration was extended from 1 to 2 years (3 when the program couples an ABE component with vocational training). Required placement standards were indexed to the unemployment rate as follows: if the unemployment rate is greater than 8 percent, any training courses seeking approval must attain a placement rate of 50% or better for the most recent 12-month period for which such data are available. Currently, the unemployment rate in Massachusetts is over 8 percent; therefore, a 50% or better placement rate applies.
Michigan	Additional types of training which may now be approved include: Remedial courses, Post-secondary education, Part time training, Online courses, Out-of-state training
Minnesota	No change.
Mississippi	No change.
Missouri	More training has been approved since the Recovery Act. Laws have not changed, but policies have helped to increase the number of approved applicants. In the past, training could be approved if it met the requirements mentioned in chart 1, but the claimant had to request approval by the Director. Since the passage of the Recovery Act, Missouri has been proactive in attempting to approve training for claimants instead of making the claimant initiate the process.
Montana	Currently it is just through interpretation of our current law and administrative rules, but we will probably be proposing a new rule as well.
Nebraska	No change.
Nevada	No change.
New Hampshire	No change.
New Mexico	No change.
New York	No change. But New York had initiated changes to its UI-approved training program (Section 599 of UI Law) prior to the enactment of the Recovery Act.
North Carolina	No change.
North Dakota	No change.
Ohio	Training (e.g., academic) that previously might not have been approved has been given consideration. This was based on the knowledge that the state administration was desiring to expand the definition of what should be considered as approved. These approvals were done on a case-by-case basis while we were formalizing a policy as a result of TEGL 21-08.
Oklahoma	The OESC has submitted a proposed rule change to OESC Rule 240:10-3-10 that will allow for greater flexibility in approving different kinds of training.
Oregon	The Self Employment Assistance program (SEA) has lowered the Worker Profiling score requirement to qualify more applicants. The TUI program automatically allows all participants to qualify for SUD so they don't have to apply for additional weeks. Trade Act changed the laws to enable more employers to qualify.
Pennsylvania	Pennsylvania broadened its definition of "approved training" through a policy memorandum.
Puerto Rico	No change.

Rhode Island	Our policy on approved training has expanded to include college-level courses in degree programs and other courses not listed on the Eligible Training Provider List which are expected to improve the UI customer's long-term employability in growing industries.
South Carolina	No change.
South Dakota	No change. The state has not broadened definitions or allowable conditions for approved training. However, the state has greatly expanded the promotion and encouragement of training as a tool leading to employment. We have utilized UI profiling and Reemployment Services to assist in identifying UI recipients who may benefit from retraining.
Tennessee	No change. We are currently looking at ways to broaden our definition of or allowable conditions for "approved training".
Texas	The Texas Workforce Commission previously considered only WIA and Trade-funded training as approved training. It has expanded its definition to allow training from other funding sources to qualify as approved training.
Utah	One element says, in part, that a claimant's unemployment must be chronic or persistent, which can be established if there have been major reductions within an industry. The Department's policy change is that while EUC is in effect, most industries have had major reductions; so most claimants meet this first standard. The exception is for those who worked in healthcare and engineering because those industries have been less affected by the recession according to labor market information. Another element says that the claimant must GENERALLY complete the training within 18 months. During the time EUC is in effect, the training must be completed within 24 months. Another element says that training should GENERALLY be vocationally oriented. During the time EUC is in effect, the training does not have to be vocationally oriented.
Vermont	We have expanded our rules to allow more training as it relates to WIA Adults.
Virginia	No change.
Washington	On February 16, 2009 the legislature expanded the eligibility requirements for Training Benefits to allow more beneficiaries to be potentially eligible to participate in the program. For unemployment claims effective April 5, 2009 or later, the deadline dates were expanded. Those who have a disability that prevents full-time training can be approved training benefits for part-time training, and a prior eligibility requirement for long term work history was removed.
West Virginia	By policy interpretation we have extended eligibility for benefits to claimants who take advantage of the Pell Grant resources to further their education and we allow WIA approved training at the commissioner's discretion.
Wisconsin	Allowed for all WIA training to be considered approved training
Wyoming	No change.

**Chart 3. State Responses to the Administration's Pell Grant Initiative**

State	Pell Grant letter sent to UI claimants?	If NO, why not?	If YES, what was the response and/or response rate?	If YES, what administrative or policy lessons were learned?
Alabama	No	Section 25-4-77(a)(3)a3 of our law provides : Such approval shall be conditioned upon the training not being a course of education for credit toward a degree.		
Alaska	Yes		Information not available.	Not aware of any feedback from UI claimants.
Arizona	No	We believe it is misleading to suggest that eligibility for Pell grants is a pathway to eligibility for UI approved training under our current regulations.		
Arkansas	Yes		We have received anecdotal information from various two-year colleges that enrollment is up as a result of the mailing of the Pell Grant letters.	Be careful to craft the language of the letter to make it clear that no additional UI benefits result from enrolling in training and that no financial aid is guaranteed as a result of receiving the letter.
California	Yes		California did a one-time mailing to over 745,000 claimants in October 2009. The response rate is not measurable.	The response to the mailing is not measurable.
Colorado	No	Colorado is still drafting the letter. The implementation of state extended benefits and payment of the enhanced benefits took priority over drafting and sending the letter regarding Pell. We expect the letter to be mailed by the first part of December.		
Connecticut	Yes		Positive response from claimants interested in training.	We are in the process of evaluating.

<b>DC</b>	Yes		The District One-Stop Center saw a marked increase in the flow of traffic and in the services.	Staff received training on the Pell Grant application process, and a Pell Grant Call Center was established. The Career Centers arranged additional workshops to meet the demand.
<b>Delaware</b>	Yes		We reached out to 30,000 claimants with a letter initially and now we continue to provide a Pell grant informational letter to claimants at the onset of the claim. To date we have received in excess of 2,000 responses to the Pell letter.	We created the mail-out letter with a coupon that the claimants could complete if interested in obtaining additional information regarding Pell. The majority of claimants did not return the coupon, but walked in to their local one-stop with the letter in hand. The increase in traffic was difficult to manage under current staffing levels.
<b>Florida</b>	Yes		Although not having a rate of response or any specific data, the Florida Department of Education noted a dramatic increase in the number of inquiries to its call center.	The Department of Education was not prepared for the volume of calls that ensued from the mailing. In addition, the letter should have contained more substance and not quite as high level.
<b>Georgia</b>	Yes		The response was positive. Many claimants enrolled in training and many were calling with the following questions: What training programs are approved and available? How do I apply for training? How much money will we pay for school?	Racquel Robinson, UI Policy and Procedures Analyst, participated in a webinar with Career Center and WIA staff to discuss the application process. Most of the application process was handled by the WIA staff located in the one-stop centers.
<b>Idaho</b>	Yes		The response was overwhelming. One stop center staff were inundated with calls and walk-in traffic regarding the letter. The state did not track the response rate, but the volume of traffic increased tremendously.	In hindsight, the state should have waited a bit more before sending its Pell Grant letter to claimants, after receiving more guidance from USDOL.
<b>Illinois</b>	Yes		About 1.4 percent of the letters mailed have contacted a special 800 number established to provide more in-depth information.	Establish a general information line to accept the inquiries.
<b>Indiana</b>	No	The information is posted on Indiana's UI website.		
<b>Iowa</b>	Yes		Large response.	Large influx of customers to offices. Organize letter and stagger so not all customers in office at once.

<b>Kansas</b>	No	Due to current workloads in the UI program and state workforce centers we feel we are unable to handle the increase in calls that would be generated by this program.		
<b>Kentucky</b>	Yes		Received increased number of calls to one-stop centers. Specific numbers were not traced.	Ensure staff is knowledgeable about Pell Grant and also open dialogue with
<b>Louisiana</b>	Yes		The letter created a drastic increase in requests for approved training.	No response.
<b>Maine</b>	Yes		We sent out approximately 35,000 letters the first week and several hundred or more each week thereafter (still sending them weekly). We received approximately 1000 calls the week following the mass mailings and still receive a significant number of calls each week in response to the weekly mailings.	There was a lot of confusion in the response to the mailing. Many claimants thought it meant they were automatically going to receive \$5,000 dollars that they could then use as they wished to pay for training (without having to identify the training first), or that the Pell grant would pay for training that had already occurred. Additionally, a common assumption was that people were going to get additional UI benefits or that UI benefits would be extended for as long as they were going to be in training. From the start, we contracted with MEOC (Maine Educational Opportunity Coalition) to provide workshops on Pell grants and Financial Aid application processes through our Career Centers (One-Stops ) statewide. This was effective.
<b>Maryland</b>	Yes		Minimal at best.	None.
<b>Massachusetts</b>	Yes		Increased number of applications cannot be specifically tied to the notification. Economic conditions and regulatory changes extending application and training timeframes are also contributing factors. Response to the notification was not specifically tracked.	There was an increase in requests for information regarding Pell Grants. However, these individuals were directed to appropriate federal sources of information.
<b>Michigan</b>	Yes		UI does not have that data.	UI does not have that data.



<b>Minnesota</b>	Yes		Insignificant response rate.	The one stop staff are pretty well-versed on how to get applicants connected to financial aid information and/or the appropriate institution.
<b>Mississippi</b>	Yes		MS had approximately 20% of letter recipients call or visit the one-stops for additional information or assistance.	The initial mailing was phased so we did not have a large influx of inquiries.
<b>Missouri</b>	Yes		We feel we have had a strong response to the letter, and we have seen a tremendous increase in the number of claimants applying for Director-approved training that are receiving a Pell Grant. We did not ask claimants to provide a direct response to the division in the letter, so exact numbers are not available.	Our letter included information directing claimants to the school they wished to attend for assistance in completing an application for a Pell grant and also provided the web address to <a href="http://www.fafsa.gov">www.fafsa.gov</a> for information.
<b>Montana</b>	Yes		I don't know the rate, but it was very low.	Some of the larger Workforce Services offices arranged workshops, but for the most part the response was so low it wasn't necessary to provide any additional services.
<b>Nebraska</b>	No	Since our state does not give payment approved status to individuals enrolled in degree track programs, sending the letter would have created confusion as it would be urging UI benefit recipients to enroll in training that would result in the loss of UI benefits. Career Center staff have been providing information to individuals who may benefit from the Pell Grant program.		
<b>Nevada</b>	No	Nevada's trust fund is insolvent and it is expected that the state may borrow up to \$1 billion to pay benefits by the end of 2010. Nevada's employers who fund the UI program can ill afford a benefit expansion at this time.		

<b>New Hampshire</b>	No	We put a message on every check stub and have inserted the information on a "New Claim Instruction Sheet" we send to every new claimant.		
<b>New Mexico</b>	Yes		UI claimants were confused and also thought that state agencies (UI) approved the Pell Grants.	Financial aid application process in order to meet the demand for information.
<b>New York</b>	Yes		We did an initial mailing of 50,000 and asked local One-Stops to track responses but the numbers were very low. As such, we did not ask areas to report when we mailed out the balance of the letters. We do not feel a response rate is a reliable indicator of the additional workload generated from UI claimants in receipt of the Pell letter, since many of them may already be in training or have been in the process of developing a training plan prior to receipt of the letter. In addition, New York State had already taken steps to expand training opportunities to UI claimants prior to the release of the Pell letters. Additionally, the funding made available to the workforce system under the Recovery Act has increased the number of individuals receiving training. As such, we can't directly correlate an increase in the number of UI claimants receiving training services to the mailing.	Since New York had already been encouraging local areas to increase training expenditures, there were not necessarily any administrative changes prompted by the Pell grant letters.
<b>North Carolina</b>	Yes			Difficult to determine with the focus on EUC.
<b>North Dakota</b>	No	Information on Pell grants to be included in the Claimant Guide mailed to each UI claimant. This information from the Claimant Guide is also made available via our website.		

<b>Ohio</b>	Yes		...just now in real process of mailing letters.	Prior to mailing, notified processing center of expanded training policies, so that any accredited training or course, including academic courses, are considered approved.
<b>Oklahoma</b>	Yes		We had a lot of people come in to the local offices for additional information.	
<b>Oregon</b>	Yes		We don't have the actual numbers but our staff fielded thousands of calls regarding the Pell Grant letters.	We worked with our partners to design the letters so that there were no surprises. Our Worksource offices were trained to direct customers to the FAFSA website.
<b>Puerto Rico</b>	Yes		N/A	We did not experience a high response rate.
<b>Rhode Island</b>	Yes		RI mailed approximately 40,000 Pell Grant letters to current claimload recipients over the course of several weeks. Currently, all UI first payments prompt a letter to the claimant. Since the letters were sent, there has been a substantial increase in the number of claimants requesting approval to attend training. The letters have generated a good response. Do not have up-to-date statistical numbers.	RI has not experienced significant problems with the rate of Pell Grant letters since the mailings were staggered over the course of several weeks. There was a need in very few instances where the training provider incorrectly believed that requests for WIA funding for the course could be approved in the same manner as the approval for waiver of worksearch. This was addressed directly with the providers and has not been an issue since.
<b>South Carolina</b>	Yes		Some recipients of the letter have inquired about how to obtain the Pell Grant. We would not characterize the response as overwhelming, but steady.	Our UI department has designated a training session for local UI staff to review the current policies on UI approved training, so they can better address the questions deriving from the Pell Grant letter.
<b>South Dakota</b>	Yes		Information still under evaluation.	information still under evaluation.
<b>Tennessee</b>	No	Modified monetary determination to reflect the necessary language to notify those claimants of the Pell Grants.		

<b>Texas</b>	Yes	Letters to claimants were mailed out beginning in early November. The letters were postponed, pending the Commission's review and approval of changes to the policy regarding approved training.	Not yet determined.	Not yet determined.
<b>Utah</b>	Yes		We tracked the response rate for two weeks in two pilot counties only and it averaged 3 to 4 percent; however, UI-approved training participants did increase by 169 percent for the 4 months since the state wide notification letters were sent compared with the 4 months before the letters.	Some EC's partnered with higher education folks to provide workshops.
<b>Vermont</b>	Yes		Many thought the money would be available without taking classes. They did not read the notice carefully. Otherwise, our response has been relatively low.	There was no negative fall out from the method by which we handled notification.
<b>Virginia</b>	Yes		We informed the claimants to contact their local community college for assistance with the Pell grant. As we received inquiries we referred them for assistance.	Not able to provide an answer at this time.
<b>Washington</b>	Yes		Quite effective. We had many customers come in with questions. Many were not prepared and had no idea what they wanted and did not understand what they needed to have a school plan for enrollment. Our colleges were impacted too, with approximately a 20% increase in traffic.	We had to bring in someone from the colleges to give us and customers a better understanding of the Pell grant process. We had to provide internal training on the electronic filing for the grant online application in order to assist the customers. The colleges were not prepared and did not have the slots available for the inquires they received or for those interested in enrolling.
<b>West Virginia</b>	Yes		To date the response has been relatively low, probably less than 10%.	No comment at this time.

<b>Wisconsin</b>	Yes		The initiative was successful in raising the profile of the Pell Grant program and encouraging UI recipients to consider this option. There was some confusion concerning the interaction of Pell Grants and the UI system, but we were able to successfully field many of the questions and refer others to appropriate educational institutions.	A special phone line was developed to answer general questions regarding school attendance and UI.
<b>Wyoming</b>	Yes		The initial response was heavy and positive. Claimants were redirected to DWS or colleges for specific information on available training.	As UI is in a different agency than Department of Workforce Services, we simply mailed the letters and answered questions regarding UI eligibility. Questions regarding how to apply for grants and what training is available were directed to DWS.
Total		49		
Total "Yes"		39		
Total "No"		10		

**Chart 4. State UI Training Policies in Specific Areas, Before and Since the Recovery Act**

State	WIA training automatically considered "approved training?"		Some 4-yr post-secondary programs allowed as "approved training?"		Academic courses not leading to a specific occupation allowed as "approved training?"		State-imposed time limit for completing training? 1/		Can out-of-state training be considered "approved training?"	
	Before RA	Since RA	Before RA	Since RA	Before RA	Since RA	Before RA	Since RA	Before RA	Since RA
Alabama	Yes	Yes	No	No	No	No	No	No	Yes	Yes
Alaska	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Arizona	Yes	Yes	No	No	No	No	Yes	Yes	No	No
Arkansas	Yes	Yes	No	No	No	No	Yes	Yes	Yes	Yes
California	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Colorado	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No
Connecticut	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
DC	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes
Delaware	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Florida	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Georgia	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Illinois	Yes	Yes	No	No	No	No	Yes	Yes	Yes	Yes
Idaho	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Indiana	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Iowa	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Kansas	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes
Kentucky	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Louisiana	Yes	Yes	No	No	No	No	Yes	Yes	Yes	Yes
Maine	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Maryland	Yes	Yes	No	No	No	No	Yes	Yes	No	No
Massachusetts	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Michigan	Yes	Yes	No	Yes	No	Yes	Yes	No	Yes	Yes
Minnesota	Yes	Yes	No	No	Yes	Yes	No	No	Yes	Yes
Mississippi	No	No	No	No	No	No	No	No	Yes	Yes
Missouri	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Montana	Yes	Yes	Yes	Yes	No	No	No	No	Yes	Yes
Nebraska	Yes	Yes	No	No	No	No	Yes	Yes	Yes	Yes
Nevada	Yes	Yes	No	No	Yes	Yes	No	No	Yes	Yes
New Mexico	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
New Hampshire	No	No	No	No	No	No	No	No	No	No
New York	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes

North Carolina	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	No
North Dakota	Yes	Yes	No	No	Yes	Yes	No	No	No	No
Ohio	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Oklahoma	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Oregon	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Puerto Rico	Yes	Yes	Yes	Yes	No	No	No	No	No	No
Rhode Island	Yes	Yes	No	Yes	No	Yes	Yes	No	Yes	Yes
South Carolina	Yes	Yes	No	No	No	No	Yes	Yes	No	No
South Dakota	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes
Tennessee	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No
Texas	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Utah	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Vermont	No	No	No	Yes	No	No	No	No	Yes	Yes
Virginia	Yes	Yes	No	No	No	No	Yes	Yes	Yes	Yes
Washington	No	No	No	No	No	No	Yes	Yes	Yes	Yes
West Virginia	No	Yes 2/	Yes	Yes	No	No	No	No	Yes	Yes
Wisconsin	No	Yes	No	No	Yes	Yes	No	No	Yes	Yes
Wyoming	Yes	Yes	Yes	Yes	No	No	No	No	Yes	Yes
Total # States	49	49	49	49	49	49	49	49	49	49
Total "Yes"	42	45	26	30	28	30	21	20	40	40
Total "No"	7	4	23	19	21	19	28	29	9	9

1/ States that answered "Yes" explain the time limits:

AZ: Not more than 52 weeks.

AR: Training must be able to be completed within two years.

CA: Training having automatic approval (see chart 1) has no time limit. Self-arranged training has a limit; training must be completed within 12 months from the time the claimant applies for training approval. This limit is set by state law.

CO: After the Recovery Act, but not necessarily because of the Recovery Act, Colorado passed a law to pay an enhanced benefit of 50 percent of the weekly benefit amount for individual's in specific training programs. Individual's enrolled in four-year post-secondary education programs are not eligible to receive the enhanced benefit payment.

DC: Courses from Colleges and Universities and certificate programs that are designed to be completed within twelve months or less.

ID: The state has traditionally not approved long term training (up to 4 yrs.) for those receiving benefits. However, every claim is reviewed on a case by case basis, so it is possible that some claimants may be approved to receive benefits under these conditions.

IL: UI-approved training has a one-year limit; WIA-approved training may be more than one year.

KS: Training duration is approved on a case-by-case basis, but generally is in relation to the amount of UI potentially available. We do not feel it benefits a claimant to approve a course they may have to quit before completion due to the exhaustion of UI.

LA: 104 week limit both before and after the Recovery Act.

MA: Previously courses needed to be completed within 1 year (18 months if the program was coupled ABE with vocational training). With the Recovery Act, this was extended to 2 years (3 if the program couples ABE with vocational training).

MD: All training limited to 12 months or less. College courses can only be allowed if the person is within 15 credits of receiving their degree.

MI: Before the Recovery Act- had to complete training within a relatively short period of time. After the Recovery Act- training is permitted for a longer period of time.

NE: The training program must be planned and scheduled so as to lead to the earliest completion and readiness for reemployment.

NC: Two year training.

ND: The answer to this question could be either yes or no. There is not an actual time limit on the training, however, ND Administrative Rule notes that the training should be vocational in nature, or short-term academic training vocationally directed to an occupation or skill.

NY: The time limit is (and has been) 24 months per Section 599 of the New York State Unemployment Law.

OR: TUI - short term, professional, technical training; Trade Act - claimants can go to school for more than 2 years.

RI: Prior to the Recovery Act, degree programs at colleges and universities were not considered approved training. Since the Recovery Act, and more specifically since the enactment of the Pell Grant Initiative, RI recognizes that more intense, longer-term degreed programs must be included in approved training determinations since our unemployed workers need to become skilled in local high-growth industries that will lead to wider-range employment.

SD: 24 months or less - prior to and since ARRA.

UT: 18 months prior to the UIPL and 24 months after.

VA: WIA and TAA training are short term training programs in an attempt to ensure that the claimant will have unemployment benefits to cover them while in training. Most of our commission approved training that falls under the 30 hour each week is short term training while benefits are being paid. Claimants pay for this training themselves.

WA: Claimants who attend full time vocational training in order to get skills necessary to obtain or retain stable employment are approved on a case by case and educational program basis. Training means a course of education with the primary purpose of training claimants in skills that will allow them to obtain employment; which is generally 2 years. Based on circumstances if prerequisites are required a program can be longer (2 ½ to 3 years for completion). We view each person's circumstances case by case. We have approved programs that included the last 1-2 years of a 4 year degree when the program will lead to specific skills, certification or licensing such as teaching or nursing.

2/ At Commissioner's discretion.



**Chart 5. Training at Community Colleges (CCs) and Other Institutions of Higher Learning (IHLs): Is It Considered "Approved Training"?**

State	Programs at CCs or other IHLs with job skills components.....	CC courses or courses at other IHLs leading to general high school equivalency diplomas.....	CC or IHL courses in adult basic education....	English as a Second Language courses at CCs or other IHLs....	Other CC or IHL courses of study, including degree and certificate programs, likely to increase the individual's long-term employability....	Any other high-return training approved in your state, especially any such training conducted at a CC or other IHL?
Alabama	No	Yes	Yes	Yes	No	
Alaska	Yes	Yes	Yes	Yes	Yes	Training for dislocated workers.
Arizona	Yes	Yes	Yes	Yes	Yes	
Arkansas	Yes	Yes	Yes	Yes	Yes	
California	Yes	No 5/	No 5/	No 5/	Yes	
Colorado	Yes	No	Yes	No	Yes	Colorado has specifically included training in an occupation in the renewable energy industry.
Connecticut	Yes	Yes	Yes	Yes	Yes	Courses that will enhance employability, for example technological courses.
DC	Yes	Yes	Yes	Yes	Yes	Allied Health, Commercial Driving, and Information Technology training have yielded the highest return on investment.
Delaware	Yes	Yes	Yes	Yes	Yes	
Florida	Yes	Yes	Yes	No	Yes	
Georgia	Yes	Yes	Yes	Yes	Yes	Yes
Idaho	Yes	Yes	Yes	Yes	Yes	
Illinois	Yes	No	No	No	Yes	
Indiana	Yes	No	No	No	Yes	We do not consider the community college to be the appropriate locus of adult remedial training. Instead, candidates in need of remediation prior to post-secondary enrollment are directed to Adult Basic Education programs.
Iowa	Yes	Yes	Yes	Yes	Yes	Apprenticeship training
Kansas	Yes	Yes	Yes	Yes	Yes	
Kentucky	Yes	Yes	Yes	Yes	Yes	
Louisiana	Yes	Yes	Yes	Yes	No	
Maine	Yes	Yes	Yes	Yes	Yes	
Maryland	Yes	No	No	No	No 3/	
Massachusetts	Yes	Yes	Yes	Yes	Yes	Any vocational or academic programs including ABE and ESL programs are eligible for approval. Participants in degree-granting programs must complete requirements within the maximum two-year timeframe.
Michigan	Yes	Yes	Yes	No	Yes	
Minnesota	Yes	Yes	Yes	Yes	Yes	

**Training at Community Colleges (CCs) and Other Institutions of Higher Learning (IHLs): Is It Considered "Approved Training"?**

<b>State</b>	Programs at CCs or other IHLs with job skills components.....	CC courses or courses at other IHLs leading to general high school equivalency diplomas.....	CC or IHL courses in adult basic education....	English as a Second Language courses at CCs or other IHLs....	Other CC or IHL courses of study, including degree and certificate programs, likely to increase the individual's long-term employability....	Any other high-return training approved in your state, especially any such training conducted at a CC or other IHL?
<b>Mississippi</b>	Yes	Yes	Yes	Yes	Yes	
<b>Missouri</b>	Yes	Yes	Yes	Yes	Yes	
<b>Montana</b>	Yes	Yes	Yes	Yes	Yes	Truck driving - heavy equipment - cosmetology - nail techs - CNA
<b>Nebraska</b>	Yes	Yes	Yes	Yes	No	Degree programs are not approved, but other general courses at community colleges and IHLs may be approved if they are likely to lead directly to gainful employment.
<b>Nevada</b>	Yes	Yes	Yes	Yes	Yes	Energy efficiency ,renewable energy, electrical line worker, air quality and health care worker certificates.
<b>New Hampshire</b>	Yes	Yes	Yes	Yes	Yes	
<b>New Mexico</b>	Yes	No	Yes	No	Yes	
<b>New York</b>	Yes	Yes	Yes	Yes	Yes	
<b>North Carolina</b>	Yes	Yes	Yes	Yes	Yes	
<b>North Dakota</b>	Yes	No	No	Yes	Yes	
<b>Ohio</b>	Yes	Yes	Yes	Yes	Yes	Ohio has been very open with special needs or training that pertains to job skills or job readiness.
<b>Oklahoma</b>	Yes	Yes	Yes	Yes	Yes	
<b>Oregon</b>	Yes	Yes	Yes	Yes	Yes	Computer courses and nursing programs.
<b>Puerto Rico</b>	Yes	Yes	Yes	Yes	no response	
<b>Rhode Island</b>	Yes	Yes	Yes	Yes	Yes	
<b>South Carolina</b>	No 3/	Yes	No	No	No	
<b>South Dakota</b>	Yes	Yes	Yes	Yes	No	South Dakota does not have a community college system. The state has invested in four technical institutes with occupational training programs; community based organizations and other institutions of higher education for delivery of GED, ABE, and ESL programs.
<b>Tennessee</b>	Yes	Yes	Yes	Yes	Yes	
<b>Texas</b>	Yes	No	No	No	Yes	
<b>Utah</b>	Yes	Yes	Yes	Yes	Yes	
<b>Vermont</b>	Yes	No 6/	Yes	Yes	Yes	
<b>Virginia 1/</b>	Yes	Yes	Yes	No	Yes	

**Training at Community Colleges (CCs) and Other Institutions of Higher Learning (IHLs): Is It Considered "Approved Training"?**

State	Programs at CCs or other IHLs with job skills components.....	CC courses or courses at other IHLs leading to general high school equivalency diplomas.....	CC or IHL courses in adult basic education....	English as a Second Language courses at CCs or other IHLs....	Other CC or IHL courses of study, including degree and certificate programs, likely to increase the individual's long-term employability....	Any other high-return training approved in your state, especially any such training conducted at a CC or other IHL?
<b>Washington</b>	Yes	Yes 4/	Yes 4/	Yes 4/	Yes	We consider certification or licensing courses such as IT programs that will upgrade skills, training that will lead to certifications such as teaching and nursing, and training that will keep a claimant current in their field such as IT occupations which require certification or licensing to stay competitive in their field. Our training programs are not designed to approve 4 year degrees but we do consider programs that are in the final 2 years of the degree that will likely enhance the individual's marketable skills and earning power.
<b>West Virginia</b>	Yes	No	No	No	Yes	
<b>Wisconsin 2/</b>	Yes	No	No	No	Yes	
<b>Wyoming</b>	Yes	Yes	Yes	Yes	Yes	
<b>Total # States</b>	49	49	49	49	48	
<b>Total "Yes"</b>	47	38	40	36	42	
<b>Total "No"</b>	2	11	9	13	6	

1/ For Virginia, the items checked "yes" are generally WIA or TAA approved.

2/ Do not approve bachelor or higher degrees unless the program is approved through WIA or TRA programs

Generally, if the training is vocational in nature, full-time and the claimant is attending and making progress, Wisconsin considers it to be approved training

3/ Under consideration.

4/ They must establish the training is the only reason for not being employable or the ESL, ABE, equivalency diploma must be linked with vocational training.

5/ In California, the criteria for approval of self-arranged training would only allow GED, Adult Basic Ed, or ESL if combined with vocational/skill based coursework in a demand occupation.

**Chart 6. State UI Policies Regarding Distance Learning as "Approved Training"**

<b>State</b>	
<b>Alabama</b>	Our state UI law requires that the training must not be a course of education for credit toward a degree.
<b>Alaska</b>	A claimant who is taking 10 or more academic credit hours is denied benefits unless the claimant is in an approved state or federal
<b>Arizona</b>	There is no differentiation.
<b>Arkansas</b>	As long as it meets all of the approved training requirements it can be considered approved training.
<b>California</b>	In California there is no policy concerning approval criteria for distance training. However, self arranged training has specific approval criteria established by state law that must be met for training approval (see chart 1). Also, statute requires that individuals in approved training must submit bi-weekly claim forms signed by the training provider to certify to the individual's satisfactory attendance and progress. Exceptions to this policy are handled on a case-by-case basis.
<b>Colorado</b>	Colorado's law does not specifically allow or deny the approval of training in distance learning programs. With the exception of WIA-approved training, an individual's circumstances are considered when making the determination to approve the training program.
<b>Connecticut</b>	To be WIA-approved the institution must have a permanent physical presence in the state. Other distance training is considered on a case-by-case basis.
<b>DC</b>	We are currently expanding our training opportunities to include Distance Learning programs and courses.
<b>Delaware</b>	Prior to the Recovery Act there was a pilot project which allowed for the approval of two distance learning programs. Following the enactment of the Recovery Act we have been approving online training programs if they are Middle States approved. There is currently a review process which requires Employment and Training to report back to the Workforce Investment Board regarding the response to distance learning programs to determine if they will continue to be approved. Currently there is a limitation that a person already have completed two years of college in order to be approved for online training.
<b>Florida</b>	No specific policy developed.
<b>Georgia</b>	Distance learning is approved as long as there is some type of interaction between an instructor and student. A means of communication must be established, where the instructor asks questions of students and the student can respond and ask questions of the instructors. Students must test periodically and training must lead to a completion of training or a degree.
<b>Idaho</b>	Under UI, there is no distinct policy for distance learning programs. They would be treated no differently than bricks and mortar training programs. This would apply to the state's WIA program as well, as long as it appeared under the state's Eligible Training Provider list.
<b>Illinois</b>	Distance learning must meet the same criteria as regular training.

<b>Indiana</b>	If a distance learning program has been deemed meritorious by the state's Educational Review Committee, it is added to the "Approved Training List" and thenceforth one in which WIA recipients may enroll. The criteria used to vet education and training programs are extensive and ones commonly used by national accrediting bodies. The criteria include faculty quality, curricular structure, pedagogical strategies, retention and attainment rates, refund policies, whether the institution has submitted its credentials to an accrediting body, and if so, the outcome of the accreditation process.
<b>Iowa</b>	Distance learning is approved, must be for a certified legitimate course with at least 6 hours of on-line participation and home work in the week.
<b>Kansas</b>	The same standards for approving normal courses are applied to distance learning programs.
<b>Kentucky</b>	Local decision.
<b>Louisiana</b>	No specific law provisions or policies on distance learning.
<b>Maine</b>	Distance learning courses/degrees can be approved. The provider and the course must go through the same approval process for accreditation check and must meet same criteria as in-person courses.
<b>Maryland</b>	Only special cases.
<b>Massachusetts</b>	<p>Distance learning programs are approvable provided: The distance learning training program must have been in place for at least one year prior to approval; The distance learning program must be offered as an alternative to a program currently offered by the training provider in Massachusetts, New England or contiguous border state in a traditional classroom setting; The training provider must demonstrate a placement rate of at least 70% (currently 50%) for those students that completed the program via the distance learning method – consistent with the overall placement rate requirement of 70% (currently 50%) for approved programs; Prior to enrollment in a distance learning program, the training provider must meet with the student in-person to assess whether or not the student has the financial and intellectual ability to successfully to complete all requirements of the program; The program must have the same curriculum as classroom training and be delivered using the same or similar training materials; Students must be required to achieve the same level of successful performance as participants enrolled in traditional classroom versions of the course</p> <p>and performance must be measured by the same means. Students must be required to communicate, as necessary, with instructors, for the purpose of asking questions and seeking additional guidance from the instructor, either by email, phone or online. Students must have the option to come onto campus or other approved facility, for tests and meetings with instructors. Training provider must be able to validate that student has personally completed all assigned course work and examinations. Massachusetts training providers must be either licensed or registered with the Massachusetts Department of Education, have a current surety bond on file with the Massachusetts State Auditor's Office if required. As a matter of convenience to claimants who live in or reside near a contiguous border state they may attend an out of state school as long as the school meets its state licensing requirements and can provide proof of placement at 70% (currently 50%) or better. New England or contiguous border state providers must be in compliance with their state licensing and Higher Education requirements.</p>
<b>Michigan</b>	Distance learning is allowed.
<b>Minnesota</b>	This is addressed in Mn Statute 268.085 Subv. 15, which was updated to address this issue.
<b>Mississippi</b>	MS' policy is based on the "approved training" and availability limitation.

<b>Missouri</b>	For claimants seeking Director-approved training status, distance learning courses must meet the same criteria as for traditional training courses. State law also requires claimants in approved training to submit a weekly written certification from the educational institution verifying the claimant was making satisfactory progress during the week. It is the claimant's responsibility to arrange with the school how to complete the certification.
<b>Montana</b>	Usually we allow distance learning under our availability law and rule because it doesn't interfere with their ability to work.
<b>Nebraska</b>	Distance training per se is not disallowed, but distance learning programs leading toward a degree are not allowed.
<b>Nevada</b>	Distance learning programs are an allowable form of training in Nevada. Criteria includes a minimum qualification for instructors, verifiable completion rates for trainees and acceptable rates of certification or licensure at completion.
<b>New Hampshire</b>	Distance learning is acceptable provided the curriculum has been approved by the NH Department of Education.
<b>New Mexico</b>	We require a class schedule from an accredited school.
<b>New York</b>	Self-paced learning is not approvable. There must be a specific start and end date applicable to all students in the course. There must be oversight from an instructor who is accessible to the student. There must be a defined curriculum with testing. The course must be offered by an entity/organization accredited by an entity accepted by USDOE.
<b>North Dakota</b>	We do allow for distance learning in North Dakota; however, the training must be conducted by an approved agency, educational institution, or employing unit.
<b>Oklahoma</b>	Oklahoma state policy is silent on this issue.
<b>Oregon</b>	We consider online classes & training for our training programs.
<b>Puerto Rico</b>	Distance training is not a UI approved training option in Puerto Rico
<b>Rhode Island</b>	We have not had a request for approval for attendance in a distance-learning program as of this date. However, we would consider this type of training in the same manner as that of an in-person degree-program. The hours of the course and attendance requirements would be considered in our determination for approval.
<b>South Carolina</b>	We have not addressed the distance learning programs specifically, but we have said that the approved training must be geared to getting a job.
<b>South Dakota</b>	The state does not have an established formal policy on distance learning.
<b>Tennessee</b>	Online courses are approved training as long as the claimant remains able and available for work.
<b>Texas</b>	Training provided entirely through distance learning must result in a nationally recognized degree or credential (nationally recognized, as defined by DOL re: the "attainment of degree/credential" WIA performance measure).
<b>Utah</b>	As long as the training provider is listed as an approved provider, Utah does not eliminate internet -based training.
<b>Vermont</b>	Unaware of any policy in this area.
<b>Virginia</b>	We only cover what was previously stated (chart 1) in our UI law.
<b>Washington</b>	We look at the same eligibility requirements for distance / online learning programs as required for class participation training. If the claimant does not meet the eligibility requirements to get approval for one of our programs we try to determine if the schooling can be non-conflicting to still allow benefits.

<b>West Virginia</b>	The same as other learning programs if the institution providing the training and the course of study are approved by the commissioner.
<b>Wisconsin</b>	Distance learning is approved if it is instructor led and meets the other qualifying conditions of approved training.
<b>Wyoming</b>	To be eligible for UI, students participating in course work during normal working hours must be in approved training if attending more than 8 hours per week.

**Chart 7. States Describe How their UI and Workforce Agencies are Cooperating to Review the Policies and Implementation Procedures on State-Approved Training for UI Claimants.....**

Indiana	The State Workforce Innovation Council, Indiana's State Board as defined by WIA, is responsible for the vetting and approval of programs of training. UI claimants are considered "in approved training" if they are enrolled in one of those programs or a four-year institution approved by the Indiana Commission for Higher Education.
Texas	Both UI and workforce services are administered by the Texas Workforce Commission. Both divisions have worked collaboratively to review the existing state policies, and to establish new policies. Under these new policies, local workforce center staff will assist in determining if claimants are appropriate for enrollment in approved training. Automation changes are in process to allow state UI staff to review the assessments conducted by local workforce center staff.
Michigan	Both agencies have reviewed the TEGE and agreed to implement the expanded types of approved training. The workforce agency screens the applicants and recommends the training for UI approval.
Colorado	Colorado UI and Workforce staff met on a weekly basis through early September 2009. Since then, the groups are meeting on an as-needed basis. The two also collaborate to communicate information to claimants; the most-recent collaboration involved UI, Workforce, and the Colorado Community College System in developing a letter to notify unemployed individuals about Pell Grants.
Wyoming	Unemployment Insurance Division adheres to statutory requirements for securing DWS certification prior to approving training.
Florida	UI and Workforce determined that UI administrative rules were sufficiently broad to meet objectives.
West Virginia	The UI, ES and WIA programs are all consolidated in West Virginia under the agency Workforce West Virginia. We work very closely together through the One-Stop system to develop our policies and procedures to integrate our services.
Tennessee	Regular meetings are held with state workforce boards to review the policies and implementation procedures on state approved training for UI claimants.
Washington	We have a large scale Process Improvement Project to better partner our UI and Labor Exchange divisions regarding how we handle training issues. We assess how we currently do the work, roles and responsibilities, and review our best practices and those from other states. The final goal is to remodel our policies and procedures to implement necessary changes.
New Mexico	A challenge.



Maine	We worked together to get the Unemployment Insurance Commission to issue a blanket approval for WIA approved courses & training providers based on a joint review of the approval process and effort to streamline the approval process. We also created a webpage on our department's website dedicated to approved training information and have linked the WIA approved training list to the UI site. UI also continues to send the federal training letter on Pell grants to UI claimants every week.
Kansas	UI staff have worked with workforce staff to provide instruction on approved training procedures.
Puerto Rico	Policies and procedures have not changed since implementation of ARRA.
Idaho	The One Stop Centers in the state of Idaho house both UI and WIA components, allowing representatives of both entities to work together to help address a claimant's needs.
DC	State UI and Workforce Development are colocated and collaborate on the implementation on training guidance to insure that UI claimants are provided information and encouraged to participate in training.
New York	The UI Division processes training approvals for individuals who are already enrolled in training at the point they file their original claims. Staff in the One-Stop system and a Central Workforce Unit handle approvals for claimants who make a decision to pursue training after filing their claim for UI. This integration of the training approval process into the One-Stop system allows staff to work with applicants to remove barriers that might result in their training not being approvable.
Maryland	Verifying registration [with WFD] of all non job attached claimants, frequent meetings regarding "what is/will be approved training, revamping of profiling model.
Utah	UI and WIA program managers discussed differences and changed the UI rules to be the same as the WIA rules.
Virginia	We have reviewed our policies and are not moving forward at this time to make changes that would only be in place during this economic climate. We have met with some of our employers to discuss what changes they would like to see, if any, in our approved training. This is a work in progress at this time.
Rhode Island	Our UI and Workforce Development administrative offices worked closely to develop policies regarding Pell Grant and Approved Training expansions. The development of our Pell Grant / Approved Training web page was the result of a collaboration between both divisions, and the two divisions communicate regularly on the new policies and the individuals requesting approved training.
Iowa	UI and workforce have worked together to approve all training which will lead to or enhance employment.
Wisconsin	UI and the Division of Employment and Training are in regular communication concerning state approved training for UI claimants. We continue to examine methods for streamlining the training approval process for claimants and UI staff.
Mississippi	MS UI and workforce are under one agency, MDES. We work closely to identify training opportunities for UI claimants.
Connecticut	We have an on going relationship and collaborate as needed.
Alaska	Clients are referred by Job Service staff to UI Claim Centers to determine UI eligibility while attending training.
Oregon	We partner closely with our WIA partners and Worksource partners to ensure the process is smooth for customers.

Oklahoma	The state UI program and the state workforce program are administered by separate divisions in the same state agency. The two division directors and their staffs regularly meet to discuss issues and opportunities.
Nebraska	The UI and Workforce programs are housed in a single agency so there is considerable interaction between the programs.
New Hampshire	The UI and WIA agencies have met to discuss the automatic approval of WIA training. [We are] Investigating the policy statements from other States who automatically approve WIA training.
South Dakota	The state UI and Workforce Services both operate under a single administrative and delivery agency, the South Dakota Department of Labor. The division directors for UI and Workforce Services report directly to the Secretary of Labor. This ensures a consistent approach to setting policies and implementation of UI and WIA approved training. UI and WIA have a long established history of successful collaboration in South Dakota.
Kentucky	Requests are approved by management for high demand training
Montana	The Workforce Services offices are helping claimants complete the forms for regular training in addition to their normal WIA process.
Alabama	We continue to work with WIA in modernizing our policies for state approved training.
Minnesota	Policy and procedures have been established both in the one stops and in the UI Program. They are monitored and updated as needed.
Missouri	UI staff speaks with claimants over the telephone and obtains information regarding the training course and the claimant's current skill set. That information is sent to Workforce Development who reviews the training information and Labor Market Information to determine if the criteria are met for the course to be considered as approved. UI staff reviews and recommends for the Director to approve the training.
Louisiana	High level discussions have occurred before and since the initiative was started. It was the desire of the new governor in 2009 to improve education and to provide better vocational education to better match the unemployed with available jobs and thus "grow the economy."
Nevada	Meetings, memorandums, field guidance.
California	In California, the UI, the Wagner-Peyser and the WIA programs are collaborating to streamline the approval process for individuals who have started training.
North Dakota	The State UI and Workforce staff work cooperatively to ensure that appropriate training is approved in each situation. Workforce staff are a critical component in assessing the availability of work, training needs of the individual, and the applicability of claimant training.
Illinois	The issue was raised at the June 2009 Advisory Board meeting. There was no agreement to expand the current state-approved training guidelines.

Massachusetts	Both the Division of Unemployment Assistance (UI) and Division of Career Services (ES) are components of the Dept. of Workforce Development and work in close cooperation to assist training candidates. The DCS maintains a listing of approved training programs and provides counseling and application assistance. DUA reviews and approves individual applications.
Vermont	Both sections have reviewed and had opportunity for input on rules and procedures currently being updated.
Georgia	Upon release of new regulations, meetins are held to discuss impact and service stream. Claimants who are interested in training will be encouraged to apply for WIA and/or provided a referral to WIA.

**Chart 8. Do States that Approve Out-of-State Training use Other States' WIA-Approved Training Lists (found via on-line search engine)?**

Alabama	Yes
Alaska	No
Arizona	Yes
Arkansas	As long as the occupation is on Arkansas' demand occupation list.
California	No
Connecticut	We do use other states' lists but primarily border states.
DC	Through the intranet and internet systems.
Delaware	All training programs must be approved by Delaware and be on our list.
Florida	Possibly
Georgia	If an individual wants to attend training in another state, the same guidelines apply. Documentation from the school must show the claimant has been accepted and is currently enrolled in training that will increase his/her skills.
Idaho	Under Idaho's WIA program, other state's WIA-approved training providers lists could be approved for use by participants, provided the same training could not be obtained through the state's providers appearing on its own Eligible Training Provider list.
Illinois	No
Indiana	The programs are reviewed on a case-by-case basis.
Iowa	Yes.
Kansas	No, but providers in other states can apply to be included in Kansas' list of approved training providers. This is done to insure they meet Kansas' state and local standards.
Kentucky	Local decision.
Louisiana	Not specifically. We require the claimant to obtain proof of WIA approval.
Maine	Not sure - believe such requests are considered on an individual case basis and researched as to the approval status.
Massachusetts	No
Michigan	Yes
Minnesota	No response
Mississippi	No, but MS has a number of approved training providers which are out of state.
Missouri	No
Montana	We don't see this situation very often; if the training facility is accredited in the other state we allow it and we would also approve any facility that WIA has approved in that state. I don't know if anyone here is aware of the on-line search engines for this purpose. That information would be helpful and we wouldn't need to contact the other state's WIA staff to get the information.
Nebraska	No
Nevada	Yes
New Mexico	If in school time in an accredited program, considered approved training and worksearch waived.

New York	Yes
Oklahoma	No
Oregon	Yes. We use the ETP (eligible training provider) list.
Rhode Island	Yes, or contact representatives in other states for approval if out-of-state vendor/training provider.
South Dakota	The training provided must also be approved on our state's WIA approved list of programs.
Texas	No response
Utah	No response
Vermont	On-line search is one of the tools, as well as direct contact to that state.
Virginia	Yes to TAA, no knowledge of WIA.
Washington	Yes, we look at WIA eligible training provider lists from other states when making a determination on eligibility for our training programs. Our Self-employment Assistance Program (SEAP) is the exception. The training program for this program requires that the training provider be on our approved SEAP list.
West Virginia	Yes
Wisconsin	Yes, we would consider the other lists and the other educational approval boards.
Wyoming	Wyoming would contact the other state for required certification.