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ARKANSAS WORKFORCE CONNECTIONS
ISSUANCE NUMBER PY 26-06

September 9, 2026

FROM: Arkansas Workforce Development Board
Cody Waits, Executive Director – Arkansas Workforce Connections
Eddie Thomas, Director – Office of Employment & Training

TO: Local Workforce Development Boards, Chief Elected Officials & Service Providers

SUBJECT: Training and Supportive Services Funding Flexibility Under Approved Waiver

Purpose

This issuance states Arkansas policy for funding training services and supportive services for WIOA Title I adult, dislocated worker, and youth participants. It implements the waiver of WIOA section 134(c)(3)(B) and 20 CFR 680.210(c), 680.230, and 680.900 approved by the U.S. Department of Labor for Program Years 2026 and 2027. This issuance takes effect immediately.

Background

Federal law has limited WIOA training funds to participants who are unable to obtain grant assistance from other sources, or who need assistance beyond what those sources provide. Applying this rule required staff to collect documentation about other aid sources before WIOA funding could be utilized, which may have contributed to significant delays in the time it took for participants to start training.

What Is Waived and What Is Not

Waived

- WIOA section 134(c)(3)(B), which limits training services to participants who are unable to obtain grant assistance from other sources or who require assistance beyond that available from other sources.
- 20 CFR 680.210(c), to the same extent, as it applies the requirement to eligibility for training services.
- 20 CFR 680.230, governing coordination of WIOA training funds with other grant assistance, including the Pell Grant reimbursement mechanics at 680.230(c).
- 20 CFR 680.900, to the extent it conditions the funding of supportive services on those services not otherwise available from other sources.

Not waived and still in full effect

- The determination that training is appropriate for the participant under WIOA section 134(c)(3)(A). Staff

must still determine, after an interview, evaluation or assessment, and career planning, that the participant is unlikely or unable to obtain or retain employment leading to self-sufficiency through career services alone, is in need of training to obtain or retain such employment, and has the skills and qualifications to participate successfully in the selected program.

- Selection of a program of training services directly linked to employment opportunities in the local area or a nearby area, made in consultation with the case manager and informed by participant choice [WIOA sec. 134(c)(3)(F)].
- The Individual Training Account requirements and the Eligible Training Provider List [20 CFR 680.300 through 680.340; 20 CFR part 680 subpart D].
- Eligibility determination and priority of service for the adult program [WIOA sec. 134(c)(3)(E); 20 CFR 680.600, 680.650].
- The prohibition on duplicate payment. WIOA funds may not pay a cost that another program has already paid for the same participant.
- Cost principles at 2 CFR part 200 subpart E. Every cost charged to WIOA must be necessary, reasonable, allocable, and adequately documented.
- For youth, the objective assessment and individual service strategy at WIOA section 129(c)(1).
- Needs-related payment rules at 20 CFR 680.930 through 680.970, including the eligibility and payment level requirements, which are unaffected by this waiver.

Effective Date and Duration

This issuance is effective immediately and applies to every training and supportive service funding decision made on or after the date of this issuance, including decisions for participants already enrolled. It remains in effect through June 30, 2028, and may be extended if the waiver is renewed.

Policy

A. No determination of other funding required

Staff must not delay a training enrollment or a supportive service decision in order to obtain proof that the participant cannot receive funding elsewhere. A determination that other grant assistance is unavailable is no longer a condition of funding training or supportive services with WIOA Title I funds. A pending Pell application, a pending FAFSA, or an unreturned call to another funder/program provider is not a reason to hold a training enrollment. Local boards should determine what combination of resources available supports the quickest path to training and employment for the participant.

It should be noted that continuing to leverage other available funding sources allows more participants to be served with limited WIOA funds. However, the attainment of other funding should not become a barrier to enrolling participants in training or providing supportive services to participants in need in a timely manner. In order to maintain the balance between the two extremes, staff should:

- Identify the combination of resources that enables the participant to reach the employment goal fastest and allows enrollment in training when the participant is ready, without waiting for another funder to act.
- Continue to assist participants in applying for Pell Grants and other aid, where it is feasible and where it does not delay service.

B. If other funding arrives later

When a participant receives Pell Grant funds or other aid after WIOA has paid for a cost, staff must review the

award and adjust so that no cost is paid twice. Where the other source covers a cost WIOA has already paid, staff must reduce the remaining WIOA obligation by that amount, or recover the duplicate payment, and document the adjustment in the participant file. The portion of a Pell Grant disbursed to the participant for education-related living expenses is not a duplicate payment of a training cost.

Because 20 CFR 680.230 is waived, the automatic training provider reimbursement mechanism in that section no longer applies. Local areas must nonetheless include a duplicate-payment adjustment clause in training provider agreements executed on or after the date of this issuance and any applicable local policies.

C. Supportive services

A supportive service may be funded when it is necessary to enable the participant to take part in career services, training services, or work-based learning, and the participant is enrolled and receiving those services. Staff do not have to establish first that the service is unavailable from another source. Staff must still document in the case file: the service provided, the cost, why it is necessary to participation, and the period it covers.

The supportive service categories at 20 CFR 680.900(a) through (l) continue to describe what may be provided. Existing payment limits, frequency caps, and approval levels are not affected by this issuance.

D. Documentation minimums

The participant file must contain, at a minimum:

- The assessment and the integrated service plan showing why training is appropriate under WIOA section 134(c)(3)(A).
- The training program selected, the provider, and the ETPL verification.
- A case note recording any resource coordination being utilized, including any other funding being leveraged and how it is being used.
- For each supportive service, the documentation described in section C.
- Any later adjustment made under section B.

Records must be entered in Arkansas JobLink in accordance with the existing documentation standards.

Local Board Action Required

1. Amend any local policy, form, or checklist that requires proof of denial or exhaustion of other funding before WIOA training or supportive services may be approved.
2. Train all case management, career services, and fiscal staff on the updated workflow and documentation standards.
3. Maintain a current asset map of funding and service resources in the local area.
4. Add the duplicate-payment adjustment clause described in section B to training provider agreements executed on or after the date of this issuance and any applicable local policies.

Policies Superseded or Affected

- State policy provisions requiring a determination of inability to obtain other grant assistance before funding training or supportive services are suspended for the duration of this issuance.
- Any state form used to document exhaustion of other funding sources is retired.
- Local board policies on training funding limits, supportive services, and Individual Training Accounts are superseded to the extent of conflict.

Inquiries

WIOATA@arkansas.gov

Expiration Date

June 30, 2028, unless earlier superseded as described under Effective Date and Duration.