

Fresno Regional Workforce Development Board

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Blake Konczal, Executive Director

OPERATIONAL DIRECTIVE

FRWDB OD # 21-21 Rev C

Date Released: November 19, 2025

To: All Fresno Regional Workforce Development Board Providers of Services

From: Blake Konczal, Executive Director

Effective Date: November 19, 2025

Subject: Training Services Guidance – Degreed Participants

Applicable Program:

I. REVISION HISTORY

September 27, 2021 – Initial Release

September 22, 2025 – Updated guidance to require that an approved waiver request is required prior to enrollment into Workforce Innovation and Opportunity Act (WIOA).

II. PURPOSE

WIOA Training Services are not entitlement services. To ensure WIOA training funds are provided for those most in need, FRWDB WIOA training funds will be prioritized for those individuals that do not possess a two (2)-year degree or higher.

This Operational Directive (OD) provides guidance to Providers of Services related to providing Training Services to degreed participants. This OD references OD 25-18, Skills Training Process.

III. BACKGROUND

While the Workforce Innovation and Opportunity Act (WIOA) is primarily designed to assist individuals with sub-bachelor's degree training, individuals with degrees can receive WIOA services like job search assistance and career counseling. Eligibility for WIOA training services depends on factors such as the ability to become self-sufficient and the inability to secure funding from other sources for training. However, WIOA also provides a priority for some individuals, such as those who are low-income, receiving public assistance, or are veterans. WIOA is intended to help a wide range of individuals find employment, regardless of their existing education level.

IV. POLICY AND PROCEDURES

A waiver request may be considered for participants who possess a two (2)-year or higher degree to receive WIOA training services, if staff have documented they are unable to obtain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

The argument that a degreed participant has not, or is not likely, to gain employment in the actual subject area of their degree may be unfounded for purposes of granting a training scholarship. There are many jobs open to individuals with Associate or Baccalaureate degrees regardless of discipline, as possession of the degree shows an ability to conduct research, retain knowledge, English language level, ability to write, etc.

However, having a two (2)-year degree or higher does not automatically exclude an individual from receiving Training Services.

As soon as a person discloses, they have a two (2)-year degree or higher and are interested in receiving Training Services, they need to be informed of this process.

For new enrollments, this process needs to be reviewed with the individual and a waiver request submitted at the time of the Self-Reliance Team (SRT) interview. The waiver must be approved prior to enrollment into the WIOA program.

1. To be eligible for a waiver, Provider of Services staff must first conduct a thorough assessment and verify and document that the participant:

- Is unemployed or underemployed and meets one or more of the WIOA Priority of Service criteria as defined in Section 5.3 of the FRWDB WIOA Intake and Eligibility Procedures Manual and is seeking upskill training directly related to their degree field (e.g., holds a degree in biology and is seeking training to become an LVN).
- Is an underemployed adult with a family income at or below the local self-sufficiency standard, as defined in Sections 5.4.3 and 5.7.3 of the FRWDB WIOA Intake and Eligibility Procedures Manual.
- Lacks transferable skills to an industry or occupation outside of their current degree field, as documented on the Skills and Experience Worksheet (Form JOB-014).
- Needs to upgrade technical skills to meet the demands of the current job market.
- Staff have determined that there are no On-the-Job Training (OJT) opportunities available in the individual's field.
- Has engaged in consistent and targeted job search efforts within industries or occupations related to their field of study and has logged a minimum of 10 job applications over a period of at least 30 days. Job search activities must be documented using the Job Search Log (Form JOB-013), which must indicate the status of each application as one of the following: no response, interviewed, or rejected.

2. The waiver request must include the following:

- Job Track Application (Form JOB-001)
- Verification that the individual meets one, or more of the of the WIOA priority of services criteria.
- Skills and Experience Worksheet
- Comprehensive skills inventory detailing current skills, competencies, and qualifications acquired through education, work experience, internships, and volunteer activities
- Job Search Log documenting at least 30 days of targeted job search activities.
- Documentation that OJT is not available
- Written summary from the individual outlining the following:
 - Steps taken to explore employment within and outside their degree field
 - Specific skill gaps identified
 - Outcomes of job applications
 - Any professional feedback received
 - A conclusion stating that, based on evidence, their current skill set does not meet the requirements of occupations outside their field of degree

3. Exempt Individuals

Waivers are not required for the following individuals:

- Dislocated Workers who have been laid off or lost their jobs through no fault of their own (e.g., due to company closure) and are unlikely to return to their previous industry or occupation
- Individuals with degrees in general academic studies (e.g., General Education, Liberal Arts, General Studies, Sociology, Political Science)

V. INQUIRIES

If you have any questions, please contact the FRWDB Adult Program Coordinator or Young Adult Program Coordinator, as appropriate.

VI. FORMS

- Skills and Experience Worksheet (Form JOB-014)
- Job Search Log (Form JOB-013)
- Job Track Application (Form JOB-001)