September 23, 2019

WORKFORCE DEVELOPMENT FIELD INFORMATION MEMO: 19-04

TOPIC: Coordination of WIOA Title I and Trade Act Training Funding with the Iowa Last Dollar Scholarship

1. **Purpose:** To transmit guidance on the coordination of training funding for participants who receive or may be eligible to receive WIOA Title I or Trade Act funding as well as the Iowa Last Dollar Scholarship. This memo rescinds and replaces Field-Memo 19-03: Coordination of WIOA Title I Funds and Iowa Last Dollar Scholarship.

2. **Background:** Iowa Administrative Code 283-15.4(261) stipulates that federal and state non-repayable aid must be applied first before applying Last Dollar Scholarship funds; however, that last payer requirement only applies to Title IV funding. The application process for obtaining federal financial aid for college or graduate school is not currently aligned with the process for determining eligibility and applying WIOA Title I or Trade Act training funding. As a result, a training participant frequently does not know if he/she is eligible for WIOA Title I or Trade Act training funding at the time an eligibility determination is made for the Last Dollar Scholarship, which creates uncertainty when calculating unmet participant need for the purpose of determining how much (if any) federal aid should apply.

3. **Substance:** The following guidance applies only to WIOA Title I and Trade Act funds:
   
   a. If a participant is determined to be eligible to receive WIOA Title I and/or Trade Act funds for training before being determined to be eligible to receive a Last Dollar Scholarship, then the WIOA Title I and/or Trade Act funds shall be applied first.

   b. If a participant is determined to be eligible to receive WIOA Title I and/or Trade Act funds for training after being determined to be eligible to receive a Last Dollar Scholarship, then the Last Dollar Scholarship shall be counted as an existing resource when calculating unmet need for application of WIOA Title I and/or Trade funds.

   c. Under no circumstances will the determinations in subparts 3.a and 3.b of this memo result in recovery of any previously paid Last Dollar Scholarship funds for the 2019-2020 academic year.

4. **Action:** This information should be shared with Local WDB and CEO Board Members as well as appropriate American Job Center and other partner staff.

5. **Effective Date:** This memo is effective from the date of this memo. The guidance on this topic is evolving and additional guidance will be forthcoming based on the results of upcoming discussions at the State level. This memo shall remain in effect until updated guidance is issued.

6. **Contact:** For questions related to the information in this issuance, please contact Michelle McNertney at 515-242-0408 or michelle.mcnerntney@iwd.iowa.gov.

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