



COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
WORKFORCE DEVELOPMENT BOARD

3433 South Higuera Street, P.O. Box 8119, San Luis Obispo, CA 93403-8119
(P) 1-805-781-1908

POLICY NO: 29-19
TO: Service Providers
FROM: Department of Social Services
EFFECTIVE: September 17, 2024, REVISED March 18, 2025
SUBJECT: Recovery of WIOA Tuition and Training Refunds

REFERENCES:

- Employment Development Department (EDD) Workforce Services Directive, WSD19-10
- WIOA Sections 134(c)(3)(F)(i) – (iv), and 185(c)(3)
- Title 2 Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)
- Title 2 CFR Part 2900, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Department of Labor Exceptions)
- Title 20 CFR, WIOA Final Rule, Section 680.230, and Section 683.410(a)(1)

PURPOSE:

This policy provides guidance to Workforce Innovation and Opportunity Act (WIOA) service providers, Eligible Training Provider List (ETPL) providers, and Workforce Development Board of San Luis Obispo County (WDBSLO) staff on the policies and procedures in place to recover Workforce Innovation and Opportunity Act (WIOA) training and tuition refunds.

BACKGROUND:

The WIOA Final Rule, Title 20 CFR 683.410(a)(1) states it is the responsibility of the recipient and each subrecipient to conduct regular oversight and monitoring of its WIOA activities and those of its subrecipients and contractors in order to determine whether expenditures have been made against the cost categories and within the cost limitations specified in WIOA and the regulations.

All subrecipients of WIOA funds must produce and maintain a written policy at the local level to ensure the recovery of unused WIOA training funds. This policy must establish general policy, specify the circumstances in which the Local Area will require a refund for over-invoiced training, and must clearly define the recovery process the subrecipient will use for over-invoicing or for services not provided.

POLICY AND PROCEDURE:

ETPL Provider:

- May invoice for the full term, trimester, or semester for the amount stated in the ITA voucher five days after participant begins training.
- Is responsible for providing its standard policy regarding the amount of tuition that must be paid in advance to enroll or accept a participant, as well as its tuition reimbursement policy.
- Must immediately notify WIOA service provider staff if a WIOA participant drops out of a training program during the period when tuition can be refunded.
- Any refund due must be received within thirty (30) days after participant drops out of training.
- ETPL provider is responsible for providing the WDBSLO staff any changes to its refund policy.

WIOA Service Provider is responsible for the following:

- Check regularly with the ETPL providers to ensure participants assigned to their caseload are still in the training program.
- Determine, for any participant assigned to their caseload, if a refund is due for early termination of a participant's training.
- Notify WDBSLO staff if a refund is due for early termination of a participant's training.
- Modify the training cost in participant's file to ensure revised training cost are allocated appropriately.
- Contact the ETPL provider and collect any outstanding training and/or tuition refund.

Over-Invoiced Payment Recovery

- Service provider shall immediately notify WDBSLO if an over-payment has occurred.
- Service provider is responsible for recovering funds from training providers.
- Training provider shall be notified by the Service Provider, in writing, regarding the over—payment and demand for repayment of funds.
- The recovered funds shall be identified as a credit on the next invoice submitted by the service provider after receipt of recovered funds.
- Should the provider incur difficulties in recovering funds, WDBSLO staff shall be notified immediately to assist with further action.

Procedure

The WIOA service provider staff will obtain the designated ETPL provider's standard policy regarding the amount of tuition that must be paid in advance to enroll or accept a participant. Service provider staff will also obtain and verify the refund policy of ETPL providers for early termination of the participant from the training program to ensure the refund policy includes:

- Percentage of the advanced payment to be returned upon non-completion of courses.
- Turnaround time of refund.
- Time spent in training before a refund will no longer be honored.
- Requirement for the ETPL provider to notify WIOA service provider staff if a WIOA participant drops out of training program during the period when tuition can be refunded.

ACTION:

The WIOA service providers and WDBSLO staff shall follow this policy. This policy shall remain in effect until such time that a revision is required.

INQUIRIES:

Any questions regarding this policy may be directed to the DSS WIOA Program Manager at 805-781-1838.

Workforce Development Board (WDB) Approval Required? Yes ☐ No ☒

Initial approval date: N/A