



**WASHINGTON GRANT FOR
APPRENTICESHIP
POLICIES &
PROCEDURES
MANUAL**

AJAC

Advanced Manufacturing Apprenticeships

2024/25 Award Year

INTRODUCTION

This is a document template to help guide Washington College Grant for Apprenticeship (WCG-A) Sponsors to specify their policies and procedures as it relates to administering WCG-A. The layout of this document provides prospective WCG-A Sponsors with the minimum requirements that the Washington Student Achievement Council (WSAC) requires as part of the review and approval process to participate in the WCG-A program.

This template is designed to allow prospective WCG-A Sponsors to add-in their policies and procedures directly into the document. Prospective WCG-A Sponsors do not need to use this template and are welcome to submit their own policies and procedures manual that meets the minimum requirements laid out in this document.

Each section provides background information to provide the basis for a policy and procedure to be in place. Laws and regulations impacting the WCG-A program may change and therefore will require updates to a Sponsor's policies and procedures.

BACKGROUND

The Washington Student Achievement Council (WSAC) was created by the Washington State Legislature in 2012. WSAC's mission is to advance educational opportunities and attainment in Washington. As part of the mission, WSAC administers the Washington College Grant (WCG) program.

The Washington College Grant (WCG) was created in 2019 to provide a statewide need-based financial aid program for income-eligible students pursuing education and career training after high school. WCG provides greater access to postsecondary education for Washington residents.

WCG was expanded to include approved apprenticeship programs under Chapter [49.04](#) RCW. The Washington College Grant for Apprenticeships (WCG-A) started in the 2020-21 fiscal year.

All WCG-A Sponsors must provide a Policies & Procedures Manual that is approved by WSAC.

If any section of the Policies & Procedures Manual refers to key personnel, please detail the position title rather than their name, and ensure that the position information is provided in the Staff Directory. The guidance provided in this manual may refer to a Sponsor Financial Aid Administrator (SFAA). The role of the SFAA should be designated and established in the Staff Directory.

This template provides space for the handling of Personally Identifiable Information (PII) in ADMINISTRATIVE CAPABILITY section; however, an effective policy and procedure for any section that relates to the handling of PII should minimally refer to that policy.

AJAC
Washington College Grant for Apprenticeship
Staff Directory

OPERATIONS & SUPPORT STAFF

Leo Vogel (SFAA) Director of Student Finance and Compliance	Phone Email	(206) 764-7940 lvogel@ajactraining.org
Adan Meza (SSSC) Student Support Service Coordinator	Phone Email	(509) 945-8390 ameza@ajactraining.org

MANAGEMENT

Leo Vogel (SFAA) Director of Student Finance and Compliance	Phone Email	(206) 764-7940 lvogel@ajactraining.org
Chris Pierson Director of Operations and Funding	Phone E-mail	(206) 456-8859 cperson@ajactraining.org
Demetria “Lynn” Strickland Executive Director	Phone E-mail	(206) 456-8861 LStrickland@ajactraining.org

AJAC
6811 S. 204th St.
Suite 380
Kent, WA 98032

Mailing Address:

6811 S. 204th St.
Suite 380
Kent, WA 98032

Website: <https://www.ajactraining.org/>

Email: info@ajactraining.org

Phone: (206) 764-7940

TABLE OF CONTENTS

To update the Table of Contents, right-click over the field and select "Update Field."

INTRODUCTION.....	2
PROGRAM INFORMATION & ACCESS.....	7
APPLICATION PROCESS.....	7
ELIGIBILITY DETERMINATION.....	8
<i>Program Eligibility</i>	9
<i>High School Diploma or Equivalent or Ability to Benefit</i>	9
<i>Previous Bachelor's Degree</i>	10
<i>Washington Residency</i>	10
<i>Financial Need and Income Cutoff</i>	11
<i>Special Circumstances</i>	11
<i>Quarters of Eligibility Remaining (QER)</i>	12
<i>Denied Eligibility</i>	12
PROGRAM INFORMATION & METRICS.....	12
• <i>All program names, details, disciplinary information, and support details can be found at https://www.ajactraining.org/standards/</i>	13
• <i>Eligibility monitoring details can be found in the Satisfactory Program Policy section of this manual</i>	13
CALCULATING AWARDS.....	13
<i>Disproportionate Disbursements</i>	13
<i>Professional Judgment Adjustments</i>	14
<i>Allowable Exclusions</i>	15
<i>Family Income Change of 3 Percent or Less</i>	15
<i>Washington Bridge Grant</i>	16
<i>Washington College Grant – Connect (WCG-C)</i>	16
• <i>AJAC SFAA will run all WG-A applicant's SSN through the WCG-C Eligibility checker prior to completing award determination</i>	16
• <i>Apprentices who meet all residency and other program requirements that appear on the WCG-C eligibility checker will be awarded at the maximum WG-A award</i>	16
• <i>Apprentices who self-identify but do not show in the WCG-C Eligibility checker will be asked to provided proof of meeting eligibility</i>	16
• <i>SFAA will contact WSAC through the secure portal to have apprentices record updated in the eligibility checker</i>	16
<i>Minimum Awards</i>	17

<i>Declining WCG-A Awards</i>	17
<i>Enrollment Intensity</i>	17
<i>Awarding Practices Not Permitted</i>	17
 MAINTAINING ELIGIBILITY	17
<i>Satisfactory Program Progress (SPP)</i>	18
<i>Denied Status</i>	20
<i>Professional Judgement/Appeals for SPP</i>	21
<i>Reinstatement</i>	21
<i>Notifying Apprentices of SPP Policies</i>	22
 PAYMENTS	22
<i>Payment Requests</i>	22
<i>Disbursement Procedures</i>	22
<i>Retroactive Awards and Payments for Previous Payment Periods</i>	24
<i>Required Apprentice Directive for Sponsors</i>	24
<i>Conditions of Award Statements</i>	25
<i>Power of Attorney Disbursements</i>	25
<i>Sponsor Repayments</i>	25
<i>Apprentice Repayments</i>	26
<i>Persian Gulf Veterans</i>	26
 REPAYMENTS	26
<i>Repayments for Deceased Apprentices</i>	27
<i>Timely Management of Repayment Referrals for Sponsors</i>	27
<i>No-Show Repayments</i>	27
<i>Sponsor Errors</i>	28
<i>Canceling In Repayment Accounts</i>	28
 REPORTING	28
 SECURE PORTAL ACCESS	29
<i>Security of Information</i>	29
<i>Secure Data Transmission</i>	29
 ADMINISTRATIVE CAPABILITY	30
<i>Records Retention</i>	30
<i>Protecting Apprentice Personally Identifiable Information (PII)</i>	30
<i>Incident Response to Security Breaches</i>	30
<i>Identity Theft</i>	31

<i>Conflicting Information</i>	<i>31</i>
<i>Reporting Suspected Fraud.....</i>	<i>31</i>
<i>Contingency Planning</i>	<i>31</i>
<i>Notification of Changes</i>	<i>32</i>

PROGRAM INFORMATION & ACCESS

Provide the policies and procedures detailing:

- How prospective WCG-A applicants would be informed of the WCG-A program.
- How prospective WCG-A applicants would be able to access information regarding the program.
- How prospective WCG-A applicants can access the program application.
- What supports would be available to assist with completing the WCG-A application, including translation services.
- What additional resources are available to WCG-A applicants.
- How information about additional resources will be provided to prospective WCG-A applicants.

- Apprentices will be notified of AJACs participation in the WG-A program through a variety of ways. AJAC will send an email to all apprentices enrolled in an eligible program at the start of each award year. AJAC also informs every new apprentice in an eligible program throughout the award year at the time of their enrollment. AJAC also informs apprentices at orientations, through newsletter announcements, and through information on the AJAC website.
- All notifications will encourage interested parties to visit the AJAC website to access more information. From there apprentices can find details about the grant, how to apply, and how to contact our SFAA.
- The program application will be available on our website. We also provide printed copies of the application to anyone that requests one.
- The SFAA handles the majority of the support regarding questions/concerns. We also have a student support services coordinator (referred from here forward as SSSC) who assists with general questions and can provide translation for any Spanish speaking individual.
- Additional resources - education tutoring assistance is available if needed. Apprentices are notified of this during their program enrollment and at orientation.
- Apprentices are notified of additional resources at their program enrollment and at orientation.

APPLICATION PROCESS

Provide the policies and procedures detailing:

- How an applicant is to submit a completed WCG-A application and application

materials.

- Provide an overview of what happens to an application once it is submitted.
- How will an application be reviewed for completeness.
- How will incomplete applications be handled and/or remedied.

*As a reminder, this section of the policies and procedures manual relates to the handling of Personally Identifiable Information (PII). An effective policy and procedure should address protecting applicant data with regards to how an applicant submits their application and application materials. General email is not an acceptable means for submission of an application.

- AJAC encourages applicants to utilize the online application form that we have available on the AJAC website (link directly to the application can also be emailed upon request) which utilizes DocuSign software to protect all PPI, verify signatures, and quickly and securely provide the application to the SFAA. Apprentices are not required to submit this way. Apprentices that prefer to fill out the application by hand can choose to mail in the application and upon receipt AJAC SSSC will upload to secure folder on our secured drive and shred the paper application after upload.
- Once an application is submitted it will be stored in a secured drive and SFAA will be notified that a new application is available for review.
- SFAA will review all applications upon receipt for completeness.
- SFAA will notify any apprentice if the application submitted is incomplete and provide detailed instructions for what is needed to complete the application.

ELIGIBILITY DETERMINATION

ARTICLE I – GENERAL PROVISIONS, Section 5, of the Sponsor Agreement to Participate in WCG-A requires that eligible Sponsors must maintain complete apprentice eligibility records

for WCG-A. WSAC reserves the right to examine and audit any records relating to this program.

For each subsection below, provide the policies and procedures detailing:

- How an applicant's eligibility will be determined and certified.
- How ineligible applicants will be informed.

Effective policies and procedures will specify what position(s) will hold the responsibility for the procedure and a timeframe for when actions should be taken.

Program Eligibility

RCW [28B.92.200](#)(5) defines an eligible individual for the WCG program as an individual enrolled in a registered apprenticeship program approved under chapter [49.04](#) RCW.

- AJAC will confirm that any applicant is currently enrolled in an eligible AJAC Program occupation
- If an applicant is not enrolled in an eligible program they will be notified by an email from the SFAA.

High School Diploma or Equivalent or Ability to Benefit

WAC [250-21-100](#) defines an eligible individual for the WCG program as an individual who has a high school diploma, or its equivalent, or meeting an ability to benefit provision for those without a high school diploma or equivalent. Equivalent standards include a general education development (GED) certificate or a certificate of completion of a home-based instruction under Chapter [28A.200](#) RCW. Ability to benefit options that a Sponsor may accept include:

- A recognized ability to benefit test as defined by federal financial aid regulations.
 - Completion of at least six college level credits towards an eligible program of study.
 - Alternate state equivalent approved by the U.S. Department of Education.
 - Co-enrollment in Washington state's Integrated Basic Education and Skills Training Program (I-BEST) and High school+ (HS+) programs that include an eligible program of study as defined in WAC [250-21-010](#)(18).
- The SFAA will review that application for self-identified education level. In the event SFAA has knowledge that education level listed on WG-A application is potentially incorrect, SFAA will verify this information with applicant.
 - AJAC will utilize the 6 credits of college level courses towards an eligible program to confirm the Ability to Benefit of an individual who does not have a HS diploma or equivalent.
 - Apprentices that wish to utilize college coursework will need to provide transcripts to the SFAA

- Apprentices who apply and do not meet the High School diploma or GED requirement will be notified of the option for ATB by the SFAA.

Previous Bachelor's Degree

RCW [28B.92.200](#)(5) defines an eligible individual for the WCG program as an individual who has not earned a bachelor's degree or higher from a postsecondary institution. WAC [250-21-100](#) also clarifies that eligible individuals cannot have a foreign equivalent; however, if an apprentice can provide documentation that their foreign bachelor's degree is not equivalent to a bachelor's degree in the U.S., the SFAA may determine that the apprentice does not have a bachelor's degree.

- Apprentices with a previous bachelor's degree will be notified that they are ineligible for the WG-A by the SFAA. As part of the notification, the SFAA will inquire if the bachelor's degree they possess is a foreign equivalent and if that is the case the SFAA will provide additional details for them to provide documentation of not meeting US equivalency. Apprentices will be instructed to visit <https://www.state.gov/global-community-liaison-office/family-member-employment/family-member-employment-in-the-d-c-area/evaluation-of-foreign-degrees/> and utilize a member organization of one of the two national associations of credential evaluation services. Apprentices will be notified that this may be costly.

Washington Residency

RCW [28B.92.200](#)(5) defines an eligible individual for the WCG program as a resident student as defined in RCW [28B.15.012](#)(2)(a) through (e). SFAAs are to determine if an apprentice meets residency requirements and should indicate which part of the residency RCW an apprentice meets in their documentation. SFAAs must retain records of this documentation. Additional guidance on residency determination can be found:

- WCG-A Program Manual: Refer to Chapter 1
- WSAC's Residency Webpage: <https://www.wsac.wa.gov/student-residency>.

Please note that an update to residency requirements requires that an individual's residence must be primarily for purposes other than postsecondary education. This means that students who take more than six (6) college credits (not including dual credit) in any one term after moving to Washington cannot count those terms as part of their 12 consecutive months of maintaining a primary residence, unless they prove that postsecondary education was not their main reason for establishing a primary residence in Washington.

Also note that guidance provided for residency determination may refer to a residency affidavit as part of the WASFA (Washington Application for Student Financial Aid). The WASFA is not required for WCG-A apprentices to complete. Prospective apprentices will need to complete the residency affidavit available at

- AJAC will use the WG-A application and the residency affidavit to determine/confirm residency. Ineligible apprentices will be notified by the SFAA.

Financial Need and Income Cutoff

RCW [28B.92.200](#)(5) defines an eligible individual for the WCG program as an individual who demonstrates financial need under RCW [28B.92.205](#); or an individual (or Washington high school student in the 10th, 11th, or 12th grade with a certificate confirming eligibility from WSAC in accordance with RCW [28B.92.225](#)* whose parent or legal guardian is an individual) who receives one of the following types of public assistance:

- Aged, blind, or disabled assistance benefits under RCW [74.62](#)
- Essential needs and housing support program benefits under RCW [43.185C.220](#)
- Pregnant women assistance program financial grants under RCW [74.62.030](#)

*RCW [28B.92.225](#) clarifies that a student does not need to produce the certificate to receive WCG.

WAC [250-21-100](#) also adds that WSAC can define financial need for WCG-A. Refer to WCG-A Program Manual for additional information.

- AJAC will utilize the WG-A application and the WSAC provided 2024/25 MFI chart and 2024/25 Apprenticeship Award Chart to determine median family income and financial need eligibility
- Apprentices who do not meet the median family income and financial need requirements will be notified by the SFAA.

Special Circumstances

Applicants, who would otherwise be considered Dependent, may request being considered as an Independent due to a Special Circumstance. Examples of situations that would qualify as a special circumstance:

- Parents are incarcerated
- Left home due to an abusive family environment
- Do not know where their parents are and are unable to contact them (and they have not been adopted)

Not all situations are considered a Special Circumstance. The following are situations that would not be considered a Special Circumstance:

- Not living with their parent(s)
- Parents don't provide them with financial support
- Parents refuse to contribute to their program expenses
- Parents don't claim them as a Dependent on their income tax return

- Parents do not want to provide their information on the application
- AJAC will utilize the 2024/25 WG-A application, which allows applicants to explain their special circumstances to determine if special circumstances that may be considered exist. If so, the SFAA will contact the apprentice for any additional information needed.
- The SFAA will notify any apprentices who request a special circumstance and are denied their request.

Quarters of Eligibility Remaining (QER)

RCW [29B.92.200](#)(6) establishes that WCG recipients may receive the equivalent of 5 full-time years of maximum eligibility. WAC [250-21-100](#) clarifies that WCG-A eligibility cannot exceed the following Washington college grant usage limits. SB 5904 extends and aligns the maximum time frame allowed to receive Washington College Grant (WCG), College Bound Scholarship (CBS) and Passport to Careers (Passport to College Promise Program and Passport to Apprenticeship Opportunity Program – PTC) to 150 percent of a baccalaureate degree, or 18 full-time quarters/12 full time semester, or the equivalent clock hours of a full-time eligibility of the published length of the program in which the student is enrolled, or the credit or clock hour equivalent.

Note: Washington College Grant includes the WA Grant for Apprenticeship (WG-A) program. Additionally, this means that apprentices who have previously exhausted their Quarters of Eligibility Remaining (QERs) could regain eligibility beginning in the 2024-25 Academic Year.

- AJAC SFAA will utilize the WSAC archive to ensure apprentices are not exceeding QER eligibility requirements prior to requesting funds.

Denied Eligibility

WAC [250-21-100](#) establishes that WCG-A recipients cannot owe a refund or repayment on a state grant and is not in default on a state student loan. All apprentices must certify that they do not owe a refund or repayment for any Washington state financial aid programs. Other factors identified in the WCG-A Program Manual may render an applicant ineligible.

- AJAC SFAA will utilize the WSAC repayment checker to ensure that no apprentices owe a refund or repayment on a state grant and/or are not in default on a state student loan prior to requesting funds.

PROGRAM INFORMATION & METRICS

For each registered apprenticeship program approved under chapter [49.04](#) RCW seeking WCG-A participation, provide the name of program(s), program requirements, and length of program(s). Also, provide program policies and procedures relating to:

- How program performance is measured.

- How an apprentice maintains minimum good standing in the program.
- How overall unsatisfactory performance or disciplinary actions is handled by program (not specific to WCG-A eligibility).
- What supports are in place to help ensure satisfactory performance criteria is met.

As related to the “Eligibility Monitoring” section, an ideal policy and procedure should clearly establish the minimum number of hours per payment period before the next disbursement can be made.

- All program names, details, disciplinary information, and support details can be found at <https://www.ajactraining.org/standards/>
- Eligibility monitoring details can be found in the Satisfactory Program Policy section of this manual.

CALCULATING AWARDS

Refer to Chapter 2 of the WCG-A Manual for guidance on calculating WCG Apprentice awards. Provide general policies and procedures for:

- How Sponsor will calculate awards once eligibility is determined.
- How awards are communicated.

Effective policies and procedures will specify what position(s) will hold the responsibility for the procedure and a timeframe for when actions should be taken.

- AJAC SFAA will review applications as they are received to determine eligibility and will utilize the 2024-25 MFI and 2024-25 Apprentice Award Chart provided by WSAC to calculate awards. SFAA will be responsible for making final determinations of eligibility.
- AJAC will follow the guidelines in Chapter 2 of the WG-A manual for determining Household/Family size for applicants as well as calculating family income.
- All eligible applicants will receive a financial aid offer (award letter) with details of their award

Disproportionate Disbursements

If a disproportionate disbursement is used, a statement shall be placed in the apprentice's file acknowledging that an uneven WCG-A disbursement has been given and why, (this usually means documented uneven costs warranting the uneven disbursement.) Provide policies and procedures around how this will be handled, communicated, and documented.

- AJAC will not utilize disproportionate disbursements

Professional Judgment Adjustments

Adjustments may be made through verification reviews and through professional judgment (PJ) by the SFAA. These adjustments must be submitted and documented on a corrected WSAC apprentice grant application. Provide policies and procedures around how professional judgements will be handled, communicated, and documented.

- Professional judgement requests will be reviewed by the SFAA and SFAA will make any determinations on approving/denying the request.
- AJAC will utilize the 2024/25 WG-A application to determine initial review of possible special circumstances.
- For any special/unusual circumstances requested, SFAA will request supporting documentation. Professional judgement for dependency override requests may include but is not limited to any or all of the following:
 - a documented interview between the apprentice and the SFAA;
 - submission of a court order or official Federal or State documentation that the apprentice or apprentice's parents or legal guardians are incarcerated
 - a documented phone call or written statement, which confirms the unusual circumstances with:
 - a state, county or Tribal welfare agency
 - an independent living case worker who supports current and former foster youth with the transition to adulthood
 - a public or private agency, facility, or program servicing the victims of abuse, neglect, assault, or violence; or
 - a documented phone call or written statement from an attorney, guardian ad litem, a court-appointed special advocate (or similar), or a representative of a TRIO or GEAR UP program which confirms the circumstances and the person's relationship to the apprentice;
 - utility bills, health insurance, or other documents that demonstrate a separation from parents or legal guardians. Note: An apprentice simply living on their own and paying their own bills does not substantiate a dependency override. Parental estrangement must also be a factor.

Documentation for dependency override must adequately substantiate the apprentice's circumstances, include the reason for the requested unusual circumstance, and should in almost all cases originate from a third party with knowledge of the unusual circumstances of the apprentice. A third party that knows the apprentice's situation—e.g., a teacher, counselor, medical authority, member of the clergy, prison administrator, government agency, or court—should establish the unusual circumstances. Evidence can be a signed letter or an official document, such as a court order. If third party documentation is not available, the SFAA may (it is not required to) accept a signed and dated statement from the apprentice or a family member detailing the unusual circumstances. Such a statement should be a last resort.

- Documentation for Special circumstances could include but are not limited to:

- For changes to income, 2022 income documents (such as 2022 Federal Income Tax Return, W-2 Forms, or last pay stub from 2022) should be compared against current income documents (such as pay stubs).
 - If someone has been laid off or unable to work due to a medical condition, acceptable documents could include a layoff notice.
 - If someone's income from 2022 has been reduced and the income from current employment is expected to continue through the remainder of the 2024 calendar year, an SFAA could evaluate a pay stub dated after June 30, 2024, (for all jobs held) to estimate total 2024 income by multiplying the YTD Gross Wages by two (2). If paystubs are not available, an SFAA can have an applicant (or parents of a dependent applicant) submit a signed affidavit disclosing their anticipated income for each month from July 2024 through June 2025 or the time period being used for the adjustment. Using projected income for an entire fiscal year is not standard practice but special circumstances may support this option.
- Upon receipt of a request for professional judgement/special circumstances statement, SFAA will notify the requester of any documents which may be needed and notify them of the outcome of their appeal.
 - All professional judgement/special circumstances documents and determinations will be saved in a secure file on our server.
 - AJAC will post the WG-A application on our website, which discloses that apprentices may request an adjustment based on special circumstances.
 - SFAA will presume that any apprentice who has obtained an adjustment for and a final determination of independence to be independent for each subsequent award year at the same Sponsor unless
 - The apprentice informs the SFAA that their circumstances have changed; or
 - AJAC has conflicting information about the apprentice's independence.

Allowable Exclusions

The SFAA may (but is not required to) subtract allowable exclusions to determine income for MFI Levels as outlined in Chapter 2 of the WCG-A Manual. Provide policies and procedures around how exclusions are allowed and documented.

- AJAC will not be utilizing the allowable exclusions subtraction from income.

Family Income Change of 3 Percent or Less

An apprentice who received WCG in the previous year and whose family income has increased by no more than 3 percent, may be eligible to continue to receive WCG in the current year. Discretion is left to the SFAA. This applies when the apprentice's current family income increases slightly above the 100 percent maximum MFI level. Provide policies and procedures around how this will be determined and documented.

- AJACs SFAA will review all applicants who received the WCG-A in 2023/24 award year AND in the 2024/25 award year have an income that falls above the 100 percent maximum MFI level to determine if their previous year income increased by 3% or less and will award the WG-A to those that fit this scenario.

Washington Bridge Grant

[ESSB 5693, Section 610](#)(15) creates the Washington Bridge Grant for eligible WCG-A students. At this time, it is implemented for 2022-23 AY. The Legislature would need to act for it to be effective beyond this year. Refer to WCG-A Manual, Chapter 2, for information on eligibility rules.

The award amount can be a flat rate, lump sum payment for the year, or awarded proportionally across terms, whichever is in the best interest of the apprentice. The award is limited to need and is not prorated by enrollment level. Student directive requirements apply to Washington Bridge Grant award.

Most award amounts are not divisible by both two and three. For Sponsors whose systems require even disbursements, the per term award may be rounded, up or down, by one dollar. This cannot result in more than a two-dollar difference over a three-quarter year or equivalent.

Provide policies and procedures that disclose how Washington Bridge Grant awards will be disbursed to eligible apprentices.

- AJAC will award all eligible Bridge Grant recipients the full lump sum payment in their initial quarter of eligibility. Bridge Grant awards will be disbursed along with their WG-A funding and will follow the same disbursement policies and apprentice Directive for Disbursing State Aid as the WG-A.
- Apprentices will be notified of the Washington Bridge Grant Eligibility in their Award Letters.

Washington College Grant – Connect (WCG-C)

- AJAC SFAA will run all WG-A applicant's SSN through the WCG-C Eligibility checker prior to completing award determination.
- Apprentices who meet all residency and other program requirements that appear on the WCG-C eligibility checker will be awarded at the maximum WG-A award.
- Apprentices who self-identify but do not show in the WCG-C Eligibility checker will be asked to provide proof of meeting eligibility.
- SFAA will contact WSAC through the secure portal to have apprentices record updated in the eligibility checker.

Minimum Awards

The Sponsor may issue WCG-A awards as low as \$1.00 per term. Sponsor should inform the apprentice of their option to decline low awards to reserve QER. Provide policies and procedures that address how an apprentice will be informed of their options.

- AJAC financial aid offers (award letters) provide instructions for declining an award and explain that doing so can preserve QER.
- Any apprentice that is determined to be eligible for less than one full quarter of remaining eligibility will be contacted by the SFAA and informed of this option.

Declining WCG-A Awards

If a WCG-A awarded apprentice wishes to decline an award, the Sponsor must maintain a written record of the award amount that is declined and the reason it was declined. This may occur, for example, when an apprentice is awarded a very small award and wishes to retain flexibility for Quarters of Eligibility Remaining (QERs). Provide policies and procedures that address how an apprentice can decline an award, and how a declined award will be documented.

- AJAC financial aid offers (award letters) provide instructions for declining an award and explain that doing so can preserve QER.
- AJAC will document the award decline in the students file on our Apprentice Tracking System software AND notify WSAC of this decision.

Less than 2,000 OJT or 150 RSI hours remaining (Enrollment Intensity)

If an apprentice has less than 2,000 OJT hours and less than 144 RSI hours remaining in their program, SFAAs will need to prorate the award based on the remaining hours. Washington College Grant refers to this as “Enrollment Intensity” based on the specific number of credits a student is enrolled in rather than ranges

- AJAC SFAA will prorate awards for apprentices who have less than 2,000 OJT hours or 150 RSI hours until they are expected to journey out of their program.
- The Calculation will follow steps 1-6 outlined in the 24-25 WCG-A Handbook on page 46.

Awarding Practices Not Permitted

All eligible apprentices must be treated equally. No group, such as single parents or part-time apprentices, may be disadvantaged relative to any other group of recipients in their access to state aid. Provide policies and procedures that explicitly capture this requirement and ensure its enforcement.

- AJAC will follow awarding practices based solely on the application and information provided to determine eligibility.
- AJAC Diversity & Equal Employment Opportunity Statement (It is the mission of AJAC that the training of all served shall be without discrimination based on race, sex, color, religion, national origin, age, disability, veteran status, sexual orientation, gender identity or as otherwise specified by law.) reinforces this practice across all of our business operations.

MAINTAINING ELIGIBILITY

RCW [28B.92.200](#)(8) and WAC [250-21-100](#) establishes that in order for an apprentice to qualify for receipt and renewal of their WCG, an apprentice must meet satisfactory program progress (SPP) as defined by the program and approved by the office. Refer to the WCG-A Manual for additional information. Sponsors are responsible for monitoring the eligibility of apprentices for subsequent payments. Provide general policies and procedures for:

- When a Sponsor will monitor eligibility
- How eligibility will be monitored

Effective policies and procedures will specify what position(s) will hold the responsibility for the procedure and a timeframe for when actions should be taken.

- Eligibility monitoring will be completed by the SFAA with assistance from the SSSA at the conclusion of each payment period.
- WG-A recipients will be monitored to ensure they are meeting the minimum standards for SPP.
- Reviews will be made prior to any disbursement for the subsequent payment period.

Satisfactory Program Progress (SPP)

A Standard Satisfactory Program Progress (SPP) policy must include:

- A maximum usage limit of five full-time years of eligibility (15 quarters/10 semesters or the clock hour equivalent.)
- A required per payment period increment SPP review for state aid.
- A quantitative standard requiring that all hours for which the aid was calculated and disbursed each payment period were completed. Each Sponsor's policy for measuring progress of the WCG-A recipients must define satisfactory as the apprentice's completion of the required hours for which they received payment. Sponsors of apprentices in Clock Hour Programs should refer to Chapter 3 of the WCG-A Manual.
- A qualitative standard. For purposes of state aid programs, the qualitative standard used to comply with Labor & Industries Apprenticeship progress standards is acceptable.
- Other Conditions of SPP Policy: An apprentice may be denied further state aid disbursements or awards if the apprentice fails to fulfill any other conditions of the Sponsor's WSAC-approved satisfactory program progress policy.

A Sponsor may submit an alternative approach to evaluating program progress that includes a plan for improved apprentice retention and completion with comparison data to ensure state funds are used efficiently. WSAC will initially determine whether to approve the alternative policy, then evaluate it over a specified timeframe, then determine whether the policy may continue to be approved.

SPP Policies must utilize this standard for successful completion of hours: Meeting the hour requirements for progression within the apprentice program are considered successfully completed. Withdrawing from the apprentice program or failing to complete the required hours within the prescribed time will not count as successfully completed

hours.

- **Maximum Usage Time Frame** - A WG-A recipient may receive the grant for a maximum of 18 quarters or the equivalent semesters/hours at a full-time rate of enrollment. AJAC defines full time as 2000 OJT hours and 150 RSI hours per year.
 - Exceptions to the combination of RSI and OJT will be made for apprentices who received “credit for previous experience” and therefore have completed all of either OJT/RSI but still have either OJT/RSI remaining to complete the program.
 - Example: If an apprentice receives credit for previous experience for 2 classes, they will finish their RSI requirement with 2 payment periods remaining to complete the program but will still have OJT hours needed for completion. During their final 2 quarters, when all RSI requirements have been completed, the apprentice will be considered full time and eligible to receive grant payments following the enrollment intensity guidelines for prorated awarding. No exceptions will be made for apprentices who voluntarily decide to not take a required class or are unemployed or voluntarily not earning OJT hours.
 - Exceptions will also be made to apprentices who are enrolled in a program where an RSI class is not available for a particular payment period but are continuing to work and report OJT hours.
 - Example: Apprentice is actively meeting requirements of RSI and OJT but is in a program where there are no class options available to them for an upcoming payment period (this occasionally occurs in less popular programs as the apprentice is nearing the finish of their program and has limited class options remaining). The apprentice can receive payment even though they are not participating in RSI for that payment period due to the lack of availability.
- **Per Payment Period Increment Review** - Prior to requesting subsequent payment, the SFAA will ensure apprentice successfully completed full time SPP requirements for previous period.
- **Successful Completion of Hours (Quantitative Standards)** - An apprentice must successfully complete hours as defined below or face potential denial of

future eligibility for grant payments.

- Successful completion of RSI will be determined by an apprentice receiving a grade of 75% or better (If an apprentice is enrolled in a pass/no pass course, a passing grade is required).
- Successful completion of OJT will be determined by an apprentice working a minimum of 447 hours per payment period.
- **Qualitative Standards** – AJAC apprentices must meet the qualitative standard used to comply with [Labor & Industries Apprenticeship](#) progress standards and an apprentice must maintain active apprenticeship status.
- All information about the SPP requirements, when reviews take place, and how/when apprentices will be notified will be included in the financial aid offers (award letters).

Denied Status

If an apprentice's initial eligibility is not maintained, the Sponsor's policy must deny further disbursement of all state aid at the conclusion of any payment period in which the apprentice fails to complete the clock/credit hours required for that payment period. Provide a policy explicitly stating this.

Also, provide policies and procedures for:

- How a denied status for WCG-A (or other denied eligibility after initial receipt of WCG-A), is communicated to an apprentice.
- If an apprentice fails to successfully complete required hours (receiving a grade of 75% or better [or passing grade in a pass/no pass class] AND completing at least 447 hours of on-the-job training) **during a payment period that they received WG-A funding** at full time enrollment level, they will be placed on **status of denied**.
- Payment periods will be defined as:
 - Period 1: September, October, November, and December
 - Period 2: January, February, March, and April
 - Period 3: May, June, July, August (all payments for this period must be made prior to the June deadline to initiate payment from WSAC).
- **Denied Status Notification** – After the SPP review is completed, all apprentices in a status of denied will be notified by the SFAA and details as to the reasoning will be provided. Apprentices will also be notified at this time of the

ability to appeal if extenuating circumstances prevented them from meeting the minimum SPP requirements.

Professional Judgement/Appeals for SPP

A Sponsor may, on a case-by-case basis, reinstate an apprentice back into satisfactory program progress in response to that apprentice's extenuating circumstances. Refer to the WCG-A Manual, Chapter 3, for additional information. Provide the policies and procedures to exercise professional judgement and/or respond to appeals for SPP.

- Appeals for SPP can be submitted if extenuating circumstances exist that may have impacted the apprentice's ability to meet the minimum SPP requirements.
- Appeals will be reviewed, and determination made by the SFAA.
- SPP Appeal form will be available on our website or by request from the SFAA

Reinstatement

Each Sponsor's satisfactory program progress policy shall state which conditions a denied status apprentice must meet before state aid will be reinstated. For example: the apprentice may have to complete a specific number of hours without state financial aid for a specific period of time or may have to show proof that hours have been made up within a designated time period. Provide the policies and procedures relating to the reinstatement of state aid.

- Apprentices that are placed in denied status will be ineligible for the WG-A.
- Without an approved appeal for SPP, reinstatement can occur by successfully completing one full payment period of SPP eligibility while not receiving the grant. This means that the apprentice would need to do the following in the SAME payment period:
 - Complete a class with a grade of 75% or better (for pass/no pass courses, a passing grade would be required) AND
 - Complete at least 447 OJT hours during the payment period
 - Example: Apprentice A receives the grant at full time enrollment level during payment period 1 of an award year (Sept/Oct/Nov/Dec). At the end of the period, it is determined that the apprentice did not meet SPP requirements. The apprentice either has their appeal denied or does not wish to appeal. During payment period 2 (Jan/Feb/March/April) the apprentice would NOT be eligible for WG-A payment. If, during payment period 2, the apprentice successfully passes their payment period 2 class with a 75% or better AND completes at

least 447 OJT hours the apprentice would be reinstated for eligibility during payment period 3 (May/June/July/August – with payment being made prior to the June payment deadline for the 2024/25 award year).

Notifying Apprentices of SPP Policies

Provide policies and procedures that outline how Sponsor will ensure effective communication of the SPP policies and procedures to apprentices. Refer to the WCG-A Manual, Chapter 3, for additional information.

- SPP policies will be available on the AJAC website and are included in the financial aid offer (award letter).

PAYMENTS

Payment Requests

Payment requests must be submitted through the use of electronic means as provided by the Washington Student Achievement Council (WSAC). Sponsors should adopt policies and procedures that support payment requests being made in a timely manner to support timely disbursement of awards to apprentices. For Sponsors with apprentices starting programs every month, WSAC recommends that Sponsors submit payment requests monthly. At a minimum, WSAC recommends that Sponsors submit payment requests on a quarterly basis, meaning once every three (3) months.

Provide policies and procedures detailing how payment requests will be made.

- AJAC will submit payment requests through the WSAC secure portal online file upload process
- Payment requests will be submitted at a minimum every four months, but AJAC will often submit payment requests monthly or even multiple times within a month

Disbursement Procedures

In accordance with administrative capability requirements, a separation of functions is required. Policies and procedures must separate the functions of offering/authorizing state aid from the functions of disbursing/delivering funds. No one office or individual may control both functions. Individuals must be organizationally independent, may not be family members, and may not exercise substantial control over the company.

Additionally, the Sponsor must confirm that the apprentice is still eligible to receive funds and is currently in good standing with enrollment/participation status at the time of disbursement.

If an apprentice fails to commence attendance/participation in their apprenticeship program or withdraws prior to the start of a payment period, Sponsors must bill the apprentice and report the repayment to WSAC for any funds received for that payment period.

Sponsors must adjust the apprentice's award if an apprentice changes their status (enrolls in a part time apprenticeship program versus a full-time apprenticeship program) prior to the start of a payment period. Sponsors that choose to cover repayment amounts owed will return the funds to WSAC via check or EFT as an award cancellation and not report the apprentice in repayment.

If apprentices withdraw or stop participating for a term without earning their required hours, no additional WCG-A payments may be made to the apprentices for that payment period on or after an apprentice's official withdrawal date. The apprentice would also be placed in denied status.

Provide policies and procedures that address and satisfy the conditions stated.

- When AJAC's SFAA initiates the payment request from WSAC, AJAC will also make payment to the eligible apprentice. SFAA checks eligibility prior to submitting the payment request and notifying AJAC business office that payment needs to be made. This ensures the apprentice is eligible and in good standing at time of disbursement of funds.
- All payments are made through AJAC business office ensuring separation of functions.
 - Apprentices are given the option to receive a paper check or enroll in direct deposit.
 - AJAC utilizes bill.com to allow apprentices to easily set up direct deposit and receive their grant funding without incurring any costs or charges.
- Apprentice changes in status will be based on RSI enrollment and adjusted as follows:
 - **Change of Enrollment Status (prior to disbursement)** - AJAC will adjust the disbursement request to match enrollment status and notify both WSAC and the apprentice of the change.
 - **Change of Enrollment Status (after disbursement)** - No change is necessary, as the apprentice was confirmed to be enrolled and attending on the day of disbursement for the amount that was requested/dispensed. AJAC only offers full-time RSI enrollment.
 - **Withdrawal (prior to disbursement)** - AJAC will not request/disburse any WSAC funding to an apprentice that has withdrawn from the program or from the quarter of which

funding is being requested for.

- **Withdrawal (after disbursement)** - No change is necessary, as the apprentice was confirmed to be enrolled and attending on the day of disbursement for the amount that was requested/disbursed. AJAC only offers full-time RSI enrollment.
- Any change in status after disbursement that results in the apprentice failing to meet SPP requirements will result in the apprentice being placed in denied SPP status as explained in the SPP section of this manual.

Retroactive Awards and Payments for Previous Payment Periods

Retroactive WCG-A payments MUST be made to eligible WCG apprentices for prior term(s) as long as they are for the current fiscal year and other program rules are followed. This applies whether, or not, the apprentice is currently enrolled. The value of the retroactive awards and payments must be based on an apprentice's rate of satisfactorily completed hours determined by the Sponsor at the end of the payment period(s). Provide policies and procedures that address and satisfy the conditions stated.

- SFAA review full award year eligibility on all applications that are received
- Payments will be made for all periods of eligibility regardless of the time the application is received, as long as the application is submitted with enough time for payment to be made in the same fiscal year.
- Apprentices will need to be in good standing for any quarter a payment is made.

Required Apprentice Directive for Sponsors

Sponsors must use WSAC's Apprentice Directive Form to record an apprentice's decision on where to apply their financial aid payment. The apprentice's financial aid payment can be deposited directly into an apprentice's account or disbursed in the form of a check based on their choice on the directive. Provide policies and procedures that address and satisfy the conditions stated.

- AJAC requires the apprentice directive form provided by WSAC to be submitted prior to any payments.
- All payments will be made in accordance with the apprentices selected payment directive.
- Apprentices can change their directive selection at any time. AJAC will pay all future payments after a directive change is submitted in accordance with the apprentices payment directive.
- SFAA will remind apprentices annually of their current directive and remind them that changes can be made at any time.
- AJAC will not influence in any way the directive selection.

- Apprentices that receive payments to their personal account can choose to have payments made in the form of a paper check or direct deposit.
 - Apprentices can sign up for direct deposit at any time using our third-party payment processing company - bill.com. Bill.com is a free resource to apprentices that does not have any charges or fees for the apprentice to use.
 - If an apprentice does not sign up for direct deposit, they will receive a paper check.
 - Apprentices that wish to change their payment function can also opt into or out of direct deposit at any time and the next periods payment will be automatically adjusted to their request.

Conditions of Award Statements

Prior to disbursement, the Sponsor must inform the state aid recipient of their responsibilities to the program through a “Conditions of Award” statement. The statement must be presented annually and can be delivered to the apprentice through paper or electronic means each year. The statement must be provided in its entirety and is not satisfied by providing a link to the document or by attaching a copy of the document. Additional information is in WCG-A Manual, Chapter 5. Provide policies and procedures that effectively address this requirement.

- AJAC will provide the full conditions of award statement electronically in the body of the email that accompanies their financial aid offer (award letter) The conditions of award statement will not be a link or an attachment.

Power of Attorney Disbursements

An apprentice whose program precludes their return to the Sponsor for disbursement of state aid funds must assign a Power of Attorney to a responsible person to receive payments on their behalf. A copy of the Power of Attorney documentation must be kept in the apprentice's file. Provide policies and procedures that effectively address this requirement.

- This does not apply to AJAC – no AJAC programs/payments preclude their return to the sponsor.

Sponsor Repayments

If an apprentice is awarded incorrectly due to Sponsor error, it is the Sponsor's financial obligation to repay the funds and they must be returned to WSAC immediately. Provide policies and procedures addressing this requirement.

- If an apprentice is determined to be awarded incorrectly, SFAA will notify

WSAC using the secure portal and all ineligible funds will be returned to WSAC immediately. AJAC assumes the responsibility for any payments that must be returned due to sponsor error.

Apprentice Repayments

Repayment is an apprentice responsibility if it is due to incorrect information provided by the apprentice or failure to complete the term. If a grant recipient leaves an apprenticeship program during a payment period in which he or she receives WCG-A, the apprentice may be required to repay WCG-A funds. Provide policies and procedures addressing how this condition is communicated to apprentices, how incorrect information, or documentation of failing to complete a term is handled, and how repayment needs will be communicated.

- Repayment is an apprentice responsibility if it is due to incorrect information provided by the apprentice or failure to complete the term. If a grant recipient leaves their AJAC program during a payment period in which he or she receives WG-A, the apprentice may be required to repay WG-A funds.
- Apprentices are notified of possible repayment issues for withdrawing during a payment period, failing to complete a term, or providing misinformation in some combination of the conditions of award letter, the award notification letter, and/or the SPP policy.
- Apprentices who fail to complete their related supplemental instruction (RSI) and/or who fail to complete their required hours of on-the-job training (OJT), but who participated in and/or attended will not owe a repayment but will be placed on denied/suspension status. Apprentices who receive funding based on fraudulent information will be required to repay 100% of the funds received.

Persian Gulf Veterans

Persian Gulf Veterans are not required to repay the unused portions of grants received under state apprentice financial aid programs. Provide a policy and procedure for ensuring that this requirement is met and how it will be documented if used.

- Persian Gulf Veterans who self-identify as such will be excluded from the repayment of unused portions of the grant.

REPAYMENTS

State Aid Repayment Policy Requirements are addressed in depth in Chapter 5 of the WCG-A Manual. Sponsors can adopt general policies as outlined in the Manual or propose alternative policies for WSAC to review.

Additionally, Sponsors may choose from two types of repayment accounts options: 1) Sponsor to Bill, or 2) In Repayment. Identify the repayment policies that Sponsor will be using and establish policies and procedures that satisfy those options.

- AJAC will utilize option 1, Sponsor to Bill
- AJAC will report that repayment is under review within 10 business days from the end of the payment period or the date of withdrawal; whichever is earlier.
- AJAC will convert to “sponsor to bill repayment amount known” within 30 days from the end of the payment period or date of withdrawal, whichever is earlier or AJAC will be liable for the funds to WSAC
- AJAC will remove the Sponsor to bill account for any apprentice that pays their balance in the same fiscal/academic year.
- Any balance that is not paid in full prior to the end of the fiscal/academic year will be converted to “In Repayment” status prior to the submission of the final reconciliation report or AJAC will assume the liability and repay the funds to WSAC.

Repayments for Deceased Apprentices

All repayments for deceased apprentices are forgiven. Please forward proof of death for all In Repayment accounts to the Repayment mailbox using the secure email function in the Portal. WSAC will process the cancellation. Provide a policy and procedure that establishes this policy.

- SFAA will notify WSAC through secure portal of any deceased apprentices to forgive repayments that may be required.

Timely Management of Repayment Referrals for Sponsors

Sponsors must notify WSAC of apprentices that require repayment through secure messaging via the Portal within 10 business days of the date an apprentice withdraws or the end of the payment period, whichever is earlier. Provide a policy and procedure that establishes this policy.

- AJAC will report that repayment is under review within 10 business days from the end of the payment period or the date of withdrawal; whichever is earlier.

No-Show Repayments

If a Washington College Grant for Apprenticeship recipient never attends courses for related supplemental instruction or completes any hours in their apprenticeship in the

payment period for which they received the grant award, the state grant repayment amount is 100 percent of the award. If a Sponsor is unable to distinguish between a no-show and an unofficial withdrawal, the no-show policy shall apply. Provide a policy and procedure that establishes this policy.

- AJAC verifies apprentice enrollment for each quarter prior to making payments.
- In the unlikely event that an apprentice is paid for a quarter that they never attend their required RSI course or never complete any OJT hours, the full grant award will be repaid to WSAC immediately by AJAC.
- AJAC will not treat this as an apprentice repayment and will assume all responsibility for immediate repayment as this would constitute a sponsor error.

Sponsor Errors

Sponsors are responsible for repaying WSAC for overpayments resulting from calculation errors. Sponsors shall reduce the apprentice's award(s) to reflect the amount the apprentice was eligible to receive. Provide a policy and procedure that establishes this policy.

- AJAC assumes repayment responsibility for all sponsor errors.

Canceling In Repayment Accounts

In Repayment accounts may only be canceled when it was determined that the repayment was created in error. Showing that a repayment requirement was posted in error may be satisfied by providing an updated last date of attendance, grade change, proof of high school diploma, etc.

Sponsors may not accept any payment or apply tuition refunds for an In Repayment account and must forward all funds to WSAC. For further assistance, contact WSAC Receivables Coordinator at repayment@wsac.wa.gov.

Provide a policy and procedure that establishes this policy.

- AJAC will cancel any In Repayment accounts upon determining the repayment was created in error.
- AJAC will forward any inquiries about or attempts to make payment of "In Repayment" accounts to the WSAC receivables coordinator.

REPORTING

Refer to Chapter 4 of the WCG-A Manual for information regarding reporting. Participating

Sponsors are required to submit eligible Washington College Grant Apprentice details via reports as determined by WSAC. Reporting of awards and payment requests should be made at a minimum on a quarterly basis and will also include a year-end report for reconciliation purposes, and an annual year-end report. Provide policies and procedures that address fulfilling Sponsor's reporting responsibilities.

- AJAC will provide the year end report for reconciliation and the annual year-end report as requested by WSAC in the timeline provided by WSAC when the request is submitted.
- AJAC will provide the quarterly reports in the timeline provided by WSAC when the request is submitted.

SECURE PORTAL ACCESS

Each Sponsor Financial Aid Administrator (SFAA) is required to obtain their own Portal login to access functions and submit reports via the WSAC Secure Portal. A universal account, or the account of another aid administrator, cannot be used to access the Portal for multiple aid administrators. It is the responsibility of each Sponsor's appointed authorizing official to promptly remove Portal access for staff who should no longer have access, such as those who are no longer employed by the Sponsor or have moved to another department. Provide policies and procedures to adhere to this requirement.

- SFAA is the only AJAC team member with portal access. In the event the SFAA is replaced with a new AJAC team member the Director of Operations and Funding will work with WSAC to create a new SFAA account for the that team member.

Security of Information

All Sponsors are expected to treat information on the WSAC Portal in accordance with the Electronic Agreement contained in the Program Participation Agreement (PPA). Sponsors and individuals are granted access to data with the expectation that they protect the confidentiality of this information with the same level of care as they do any other highly confidential document. Provide policies and procedures that ensure that the Security of Information on the WSAC Portal are adhered to.

- All information on the WSAC portal will be treated in accordance with the Electronic Agreement contained in the Agreement to Participate.
- AJAC will protect the confidentiality of all information obtained on the WSAC portal similar to other highly confidential documents
- AJAC will notify WSAC immediately in the event of any breaches or potential breaches of data.

Secure Data Transmission

No personally identifiable information (PII) shall be transmitted to WSAC via email. All Sponsors must send information to WSAC via the secure message function in the Portal. Provide policies and procedures that ensure secure data transmission.

- No personally identifiable information (PII) shall be transmitted to WSAC via email. SFAA will only send PII information to WSAC via the secure WSAC Portal.

ADMINISTRATIVE CAPABILITY

Records Retention

Records relating to the state aid programs must be maintained in accordance with RCW [40.14](#). This law requires all documentation substantiating an apprentice's eligibility for, and receipt of, state aid be maintained for six years in accordance with the Washington State Record Retention Schedule. If hard copy records are kept, they must be maintained in a fireproof locking cabinet with limited access by authorized personnel only. Provide policies and procedures that address record retention compliance.

- AJAC will maintain all files electronically on a secure drive for a minimum of 6 years after the conclusion of the fiscal year in accordance with the Washington State Record Retention Schedule.

Protecting Apprentice Personally Identifiable Information (PII)

Sponsors are required to adhere to or exceed Washington State Policy for PII and abide by federal rules contained in the Family Educational Rights to Privacy Act (FERPA). PII is information that can be used to identify an individual. FERPA's definition of PII includes any information that, alone or in combination, is linked or linkable to a specific apprentice. Appropriate administrative, technical, and physical security practices must be in place to protect the confidentiality, integrity, availability, and control of personal information. Provide policies and procedures that ensure the protection of PII. This includes, but is not limited to, protecting PII provided on forms (in paper or electronically), secure online servers, locking fireproof filing cabinets, and a thorough understanding of what constitutes PII.

- AJAC treats all PII information as secure and follows all FERPA guidelines established around the protection of PII.

Incident Response to Security Breaches

Sponsors are required to establish policies and procedures around incident response to security breaches, which need to include notification to WSAC.

- AJAC will notify WSAC immediately in the event of any breaches or potential breaches of data.

Identity Theft

Sponsors are encouraged to develop and implement a written Identity Theft Prevention Program that protects, prevents, and responds to patterns, practices, or specific activities that may indicate identity theft. Policies and procedures should also include reporting of such activities to WSAC.

- AJAC will notify WSAC immediately in the event of any breaches or potential breaches of data.

Conflicting Information

All applicants for state aid, regardless of the application filed, must resolve conflicting information. In accordance with administrative capability standards, Sponsors cannot ignore conflicting information unless the student dies or is no longer enrolled when the Sponsor learns of conflict and all state aid previously disbursed. If the Sponsor should have resolved the conflict while still enrolled, the Sponsor may be liable for overpayments. Provide policies and procedures that address conflicting information.

- SFAA/RPM will follow standard review policy regarding the resolution of conflicting information for any WG-A applicant. This may require SFAA/RPM to collect additional information from the applicant.

Reporting Suspected Fraud

Any participant who obtains state aid by means of a willfully false statement or failure to reveal any material fact, condition, or circumstance affecting eligibility will be subject to applicable civil and criminal penalties and repayment of all state aid funds received. Suspected fraud must be reported to WSAC.

- If fraud is suspected, AJAC will report to WSAC immediately upon determining such.

Contingency Planning

Sponsor should demonstrate and provide policies and procedures regarding security emergencies, system failures, natural disasters, funding freezes, fraud or abuse, loss of approved programs, or bankruptcy.

- AJAC maintains a separate investment account as a contingency for unexpected financial security emergencies, funding freezes, or other related emergency situations. The investment account is designed to maintain at least 6 months of funding for AJAC operations in the event of any unexpected financial emergencies.

- AJAC's student database is maintained by a third-party vendor (Working Systems) that regularly backs up all student data on a nightly basis. In the event of a system failure, AJAC will work with Working Systems to recover any data that might be compromised. AJAC uses QuickBooks Online accounting system for its financial transactions, which is backed-up nightly as well.
- AJAC staff responsible for the WCG-A work in two different states (Washington and Hawaii) and can work remotely from both locations, including email access to AJAC's server and student database. In the event of a natural disaster in either location, AJAC staff are cross-trained to be able to continue providing WCG-A assistance to apprentices if members of the team are unable to access the system for any period of time.
- AJAC contracts with a third-party auditing firm to conduct bi-annual audits of financial operations. AJAC also follows federal guidelines to conduct single program audits for any financial year where federal revenues exceed \$750,000 per year.
- All AJAC staff sign an acknowledgement within AJAC's Employee Handbook outlining their understanding of AJAC's code of ethics related to fraud or abuse. Employees are not allowed to accept gifts, gratuities, free trips, personal property, or other items from an outside person or organization as an inducement to provide services. AJAC also maintains an Open Door policy for employees to come forward with any suspected fraud, abuse, harassment, or other inappropriate conduct observed.
- AJAC regularly assesses apprenticeship program compliance with the Department of Labor & Industries and follows all required program audit requests to ensure that active program status is maintained.

Notification of Changes

The Sponsor designee responsible for signing the Program Participation Agreement (PPA) must notify WSAC within 30 days of material changes affecting the Sponsors—including additional locations of the Program as applicable that may impact an apprentice's eligibility for state aid.

Material changes that must be reported to WSAC within thirty days include, but are not limited to:

- Contact information for Sponsor's financial aid administrator
- Sponsor ownership
- Third-party servicers
- Changes to status with Washington State Labor and Industries

Any findings (including preliminary ones) or discoveries resulting from an internal or external program review or audit shall be sent directly to WSAC.

Provide policies and procedures that ensure this Sponsor requirement is adhered to.

- AJAC will report changes to the following to WSAC within 30 days:
 - Contact information for Sponsor's financial aid administrator
 - Sponsor ownership
 - Third-party servicers
 - Changes to status with Washington State Labor and Industries