



Workforce Policy Bulletin #01-17 - NEW

Effective Date: Sept. 15, 2017

Approved by:


Donna P. Van Wert, Interim Executive Director

Re: Individual Training Accounts (ITAs)

PURPOSE

The purpose of this policy is to provide direction for establishing Individual Training Accounts (ITAs) for Workforce Innovation and Opportunity Act (WIOA) Adults, Dislocated Workers and Out-of-School Youth ages 18-24.

BACKGROUND

Under the Workforce Innovation and Opportunity Act (WIOA), one of the ways training services may be provided to WIOA Title I Adult, Dislocated Workers, and Out-of-School Youth is through the issuance of ITAs. ITA's are established on behalf of eligible individuals to fund occupational classroom training and web-based trainings that are listed on the State's Eligible Training Provider List (ETPL). ITA funds are used for tuition costs, required books, fees, specialized course-specific supplies or activities and may also fund pre-requisite training if required by the approved training program. Through the ITA, eligible and appropriate participants receive occupational skills that lead to industry recognized certificates, credentials, licenses, or degrees. Participants are expected to use information such as skills assessments, labor market conditions/trends, and training provider's performance when selecting training, and to take an active role in managing their employment future through the use of ITAs.

POLICY

ITAs may be made available to eligible and appropriate participants when it has been determined the individual will be unlikely or unable to obtain or retain employment that leads to *self-sufficiency* from previous employment or through career services alone. ITAs may be provided to eligible participants who have been assessed and determined to have specific skill-related barriers to employment.

Training programs selected shall be connected to occupations in demand, based on current labor market information with an emphasis on employment opportunities within the Workforce Development Board's (WDB) priority industry sectors. Training shall lead to an industry recognized certificate, competency or skill recognized by employers.

A. Eligibility Criteria for Training

Participants shall meet the following criteria:

1. The participant is unemployed or is employed in *stop-gap employment* or at a wage that is below the *level of self-sufficiency*.
2. A comprehensive assessment determined the participant was in need of training services to obtain or retain employment that leads to *self-sufficiency* or wages comparable to or higher than wages from previous employment.
3. The participant possesses the skills and qualifications needed to successfully complete the desired training program.
4. The participant has a GED or high school diploma and is proficient in basic skills per an assessment of the participant's reading and math comprehension level. Approval may be granted by Program Management to waive the GED/diploma requirement for specific occupational training.
5. The participant has demonstrated the following:
 - Commitment to completing the identified training program
 - Knowledge of the targeted demand occupation in the local area or proposed area of employment
 - Knowledge of the job requirements and working conditions of the chosen career
 - Knowledge of training courses available and pertinent performance and cost information
 - The ability to meet the training provider's entrance requirements
 - The training program is consistent with the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS)
 - Attendance at all required appointments
6. The participant has been unable to secure other financial assistance and understands that WIOA funds may only be used when other sources of funding are not available to cover the full or partial costs of training.
7. The participant has not had a WIOA-funded ITA in the 24 months prior to current participation. This requirement may be waived on a case-by-case basis with Management approval if proper justification has been provided.

B. ITAs for Out-of-School Youth (OSY)

ITAs are a permissible use of Youth Funds for OS youth between the ages of 18-24.

In-School Youth (ISY) 18 and older who are co-enrolled in the Adult program may be issued an ITA for the services provided under the Adult program and must use Adult program funding.

Co-enrollment does not allow the time limitations or cost limitations, as specified by this policy, to be exceeded.

C. Selection of Training Providers

WIOA service providers will assist participants to make well-informed training decisions and provide guidance in selecting a training facility and specific program from vendors currently on the ETPL, as required by WIOA. The selected training provider must demonstrate a WIOA Active Status. Exceptions to the ETPL requirements may occur when special grant funding allows for flexibility. Additionally, the Local Board may approve other providers based on local need within the guidelines of WIOA and criteria established by the state.

The WDB may prohibit the referral of participants to training vendors and/or training programs that have demonstrated poor performance.

ITAs may be used for registered apprenticeship programs that are listed on the State approved ETPL.

WIOA program staff is responsible for verifying both the training provider and selected training program are listed on the ETPL and meet local WDB requirements.

D. Funding and Duration Limit

Under WIOA, ITAs may be used when other no-cost training is not available or there are other conditions (location, schedule, etc.) that would make attending no-cost training unfeasible. Prior to receipt of an ITA, all other training options and funding sources for training services shall be exhausted, including Pell Grants and other grant assistance (excluding loans). WIOA program staff is responsible for documenting that the training provider and training program qualify for financial assistance.

ITA funds are used for tuition costs, required books, fees, specialized course-specific supplies or activates. An ITA may fund prerequisite training if it is required by the approved training program.

In general, training should not extend beyond eighteen (18) consecutive months. In special circumstances, a waiver for an ITA of extended duration may be approved by Program Management.

Under no circumstances may an ITA begin without the proper approvals and documentation in place. Program staff shall work with participants to ensure there is adequate lead time (two (2) weeks minimum) to develop and process the ITA **before** the training start date. Inaccurate, incomplete or late forms or missing approvals may result in a participant not being able to start training as scheduled.

E. ITA Payment Limits

The maximum ITA amount is \$5,000 per customer. (Executive Committee 9.13.17) In special circumstances, a waiver to exceed the payment limit may be approved by Program Management. Exceptions may also occur when special grant funding allows for flexibility. Participants may use other sources of funds to cover training costs that exceed \$5,000.

F. ITA Cancellations & Modifications

Service Provider staff is responsible for initiating cancellations and modifications and seeking the proper approvals.

An ITA Cancellation occurs when:

1. A participant does not start training
2. A participant drops out of training
3. A participant is approved to attend a training with a different provider than originally planned

ITA Modifications occur when:

1. There are changes to the training dates and/or cost.

G. CalJOBS Reporting

Service Provider staff is responsible for recording participant data into CalJOBS. (WPB 04-15: Participant Data in CalJOBS). Program staff shall ensure that CalJOBS is kept up-to-date and contact MIS if/when an activity code needs to be voided or when other corrections to data are needed.

H. ITA Review and Approval Procedures

Service Providers shall adopt the WDB's procedures or develop procedures that ensure all WIOA regulations and WDBCCC policies concerning ITAs are adhered to. A copy of ITA procedures shall be submitted to and require the approval of WDBCCC Management staff prior to the issuance of any ITAs.

I. Recovery of Unused WIOA Training Monies

To ensure prompt return of any unused training monies, WIOA program staff shall track the participant's monthly progress. Refund amounts are based on the school's published refund policy in effect at the time the ITA started. Program staff shall initiate the refund process as soon as they become aware that the participant is no longer attending.

J. Appeals Process

Participants have the right to file an appeal if they are denied training. If a participant believes they have been unfairly denied access to training, they may file a complaint using the published grievance or complaint procedures outlined in the Workforce Innovation and Opportunity Act Participants Rights form.

REFERENCES

- WIOA Section 134 (c)(3)
- WIOA Section 129 (c)(2)(D)
- Title 20 CFR 680.230
- Title 20 CFR 680.300, 680.320, 680.330, 680.340
- Title 20 CFR 681.550
- WIA Directive WIAD04-4, "Recovery of WIA Tuition and Training Funds" (August 18, 2004)

INQUIRIES

For questions or assistance related to this policy, please contact WDBCCC Staff at 925.602.6800.