
INDIVIDUAL TRAINING ACCOUNT POLICY #: 3004

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Purpose:

To provide policy and procedures regarding the use of Workforce Investment Act funds for Individual Training Account (ITA) assistance including eligibility, funding allocation and locally imposed limitations. This policy only applies to WIA-funded programs within the SW Washington Workforce Development Area comprised of Clark, Cowlitz, and Wahkiakum Counties.

Background:

Under the Workforce Investment Act (WIA), Title I-B training services for registered customers are provided through Individual Training Accounts (ITAs).

Customers are expected to take an active role in managing their employment future through the use of ITAs, among other resources. Registered customers receiving training under this approach will receive information they need (e.g., skills assessment, labor market conditions and trends, training vendor performance) to make a self-informed choice about their own employment future – and the training to support their decision.

WIA regulations allow the state or local Board to impose limits on the dollar amount and/or duration of ITAs as long as those limits are not implemented in a manner that undermines the Act's requirement for providing training services while maximizing customer choice in the selection of an eligible training provider. Limits to ITA's may be established in these ways:

1. Limits for each customer, based on the needs identified in the individual employment plan; or
2. Policy decisions to establish a range of amounts and/or a maximum amount applicable to all ITAs.

ITAs are funded with WIA Title 1B Adult and Dislocated Worker funds and are not allowed for youth customers (age 14-21). However customers, age 18 and above, may receive ITAs if they are eligible for training under the Adult and/or Dislocated Worker Program.

Policy:

An ITA is a training option available to eligible and appropriate customers when it is determined by a case manager that they will be unable to obtain or retain employment through core or intensive services alone. An ITA is limited in cost, duration, and must lead to employment in an approved occupation.

Training services funded through an ITA are defined as one or more courses or classes that, upon successful completion, lead to a:

- Certificate or associate degree; or
- Competency or skill recognized by employers and Southwest Washington Workforce Development Council (SWWDC); or
- Training regimen that provides customers with additional skills or competencies generally recognized by employers and the SWWDC.

ITAs are not entitlements and shall be provided to participants on the basis of an individualized assessment of the person's job readiness, employment and training needs, financial, social and supportive needs, labor market demand, and potential for successful completion. The customer's Individual Employment Plan (IEP) shall provide the justification for all services to be given including the appropriate combination of training and other services for the participant to achieve their employment goals. Priority must be given to *enrolled and otherwise eligible* veterans and their spouses under the Jobs for Veterans Act (see SWWDC Veteran's Priority of Services and Eligibility Policy #3019).

When awarding an ITA, the registering WIA Service Provider assumes full (program) financial responsibility for the registrant, even when training is provided in another WDC jurisdiction. The WIA Service Provider awarding the ITA will be designated as the "area of registration" for anyone in training, thereby identifying the source of any future ITA funding for the trainee, regardless of where the training is provided. The financial responsibility of the registering WIA Service Provider (area of registration) extends to supportive services. Emergency job or program counseling may be provided in either area of registration in which the training occurs.

Prior to the issuance of an ITA, customers must receive a continuum of services in at least one Core and one Intensive service categories. After which, a customer may be considered for referral for training services and ITAs. Customers, who have been assessed and identified with specific barriers to employment, may be issued ITAs only after their specific barriers have been addressed.

WIA funding for training is limited to customers who are unable to obtain other grant assistance for training or who have a financial need that exceeds the assistance available from other sources. Training providers must consider the availability of Pell Grants and other grant sources to pay for training costs, so that WIA funds supplement rather than replace the other sources of training grants.

Once awarded, the customer must be registered in approved training within 90 days of designation of the ITA award.

a) Pre-requisite to Skill Training Programs

Prerequisite training to a vocational training program may be funded if it is required by the educational institution and ultimately leads to a credential in a demand occupation. Academic training may be approved if it meets specific requirements for certification, licensing, or specific skills necessary for an occupation within the demand occupations listed.

b) Pre-Vocational Skill Training

The SWWDC has adopted the approved definition of pre-vocational services to include short-term or low cost preparatory training lasting less than a week or at a cost of \$500 or less as an intensive service, which is not to be funded through an ITA award. Prevocational training is considered an intensive service.

The Department of Labor has determined that adult literacy or basic computer literacy services are not part of the definition of training services under WIA Title IB. By SWWDC definition, 'English as a Second Language', (ESL) also falls under 'Other Intensive' services. The requirements for Individual Training Accounts do not apply for these services. Please refer to the "WIA Intensive and Training Reference Chart".

c) Eligible Training Providers

An ITA can only be issued to training provided by an educational institution that is on the Washington State Eligible Training Provider List (ETP) and in a program also listed on the ETP. This information is posted on the Internet at: www.wtb.wa.gov/etp/.

The SWWDC, in partnership with the state, will identify training providers whose performance qualifies them to receive WIA funds to train adults and dislocated workers. These include post secondary educational institutions, national apprenticeship programs, community-based organizations and private organizations, other public or private providers, and local Workforce Councils who meet conditions of WIA Section 117(f)(1).

Out-of-State / Out-of-Area Providers: All training programs must be within a reasonable commute of the SWWDC area. Out-of-the area training programs that are not within commuting, may be approved on a case-by-case basis pending the customer's demonstrated ability to incur all extraordinary costs (i.e.: living expenses). All approved training must be located within the contiguous United States, and those training providers must be listed on that state's eligible training provider list.

d) Covered costs

Only required costs associated with approved training programs will be covered. Optional costs, including tuition and fees for coursework not included in the required course of study; textbooks not listed as required on course syllabi; and supplies, training materials, and tools which are not required for all participants in the training program, are not covered. Exceptions will be considered on a case by case basis and must be pre-approved by the trainee's WorkSource employment counselor.

Required costs covered through an ITA for approved training programs are as follows:

- Tuition, enrollment fees, and other fees such as lab and testing required for coursework outlined in the required course of study;
- Required textbooks as listed on course syllabi;
- Required supplies and training materials as listed on course syllabi or supply lists; and required tools as listed on course tool lists.
- Pre-requisite coursework may be included under the maximum authorization and duration as long as it is obtained from an eligible training provider listed.

Supportive services, if appropriate, shall be delivered pursuant to the SWWDC Supportive Services Policy #3005.

e) Needs Assessment / Individual Employment Plan (IEP)

A thorough assessment of each customer should be done prior to final approval of an ITA. Recommended assessment criteria include:

- Customer's educational level;
- Previous skills training;
- Employment readiness level;
- Career goals;
- Customer's aptitude for the selected training;
- Availability and length of training;
- Cost of training;
- Financial ability of customer to undertake and complete training; and
- Potential for a customer to obtain employment at a livable wage.

The ultimate choice of an employment goal and subsequent training program requires careful consideration of a variety of factors. It is strongly recommended that in addition to taking into account a customer's personal interests, Select Fit, or other occupational matching tools, and/or aptitude assessments be utilized to validate and ensure an appropriate match.

f) Satisfactory Progress in Training

Customers are required to make satisfactory progress in training to access all payments of their ITA. Satisfactory progress is defined as:

- The customer's grade point average does not fall below 2.0 for more than one consecutive quarter or semester;
- The customer maintains a grade point average sufficient to graduate from, or receive certification in, their approved area of study; and,
- The customer is completing sufficient credit hours to finish their approved course of study within the timeframe established under their approved training plan.
- In the case of self-paced or non-graded learning programs, satisfactory progress means participating in classes and passing certification examinations within the time frame established under their approved training plan.

Contact with the employment counselor/case manager and documentation of satisfactory progress in training must occur, at a minimum, at the end of each quarter during the lifetime of the training plan to ensure satisfactory progress in the training program. Generally, grade/competency reports or other appropriate information will be submitted by the student. If the student does not submit the required documentation, within the timeframe established by the employment counselor, the participant will be declined future ITA funds until the information is received.

g) Modification to Employment Plan / Subsequent ITA:

A customer may only modify their Employment Plan with prior approval from the One Stop Operator or designated staff. The same is true for second and subsequent ITAs. In this case, justification supporting further training in order to obtain employment is required.

h) Availability of Funds Disclaimer

Training resources for customers is contingent upon the availability of funds provided by WIA.

ITA FUNDING AMOUNTS AND LOCAL LIMITATIONS

It is the intent of the SWWDC to use ITA dollars to help eligible residents gain a self-sufficient wage and to primarily focus training “investments” on building skills for occupations determined to be in high demand and/or critical to the local economy. As a result, ITA funding through the SWWDC will be limited to only those customers who reside or work in Clark, Cowlitz, and Wahkiakum Counties. Dislocated Workers who are program eligible as a result of lost employment from a job within any of the three counties may also receive ITA funding.

In response to the target industry investment priorities identified in the Strategic Plan, the SWWDC has established three occupational categories eligible for tuition assistance. The SWWDC authorizes tuition assistance as follows:

Occupations approved for ITA funding:

In response to the target industry investment priorities identified in the Strategic Plan, the SWWDC has established three occupational categories eligible for ITA funding. The SWWDC authorizes ITA funding as follows:

- **Priority Demand Occupations:** Tuition assistance may be approved for occupations that the SWWDC has determined to be in high demand as listed on the Qualifying Occupation List.
Maximum ITA Amount: \$7,000 for the duration of training
Duration of Training: Up to 2 years
- **Demand Occupations:** Tuition assistance may be approved for occupations that the SWWDC has determined to be in demand, but lacks a significant projected growth potential as listed on the Qualifying Occupation List.
Maximum ITA Amount: \$7,000 for the duration of training
Duration of Training: Up to 2 years
- **Provisional Occupations:** A limited number of training services may be approved for occupations listed as “in balance” if evidence exists that the occupation pays a Self-Sufficient wage with adequate local demand as determined by the SWWDC. Evidence may include results from a local skills panel, employer surveys, or other documentation that indicates the industry is experiencing difficulty finding qualified workers or is anticipated to experience a significant workforce loss due to future retirements. Priority occupations will be individually listed on the SWWDC website along with corresponding funding amounts and any limitations on the length of training.
Maximum ITA Amount: \$5,000 for the duration of training
Duration of Training: Up to 2 years

In no event shall an ITA carry a time or dollar balance after the program of training is either completed or terminated.

NOTE: ITA's and OJT's can be combined as long as the total cost does not exceed the maximum funding cap of \$10,000 for that specific occupation. Exceptions require prior approval from the SWWDC program manager.

WAIVERS

On an individual basis, the SWWDC may waive local policy requirements for any individual with physical or sensory disabilities or other unusual circumstance and it has been determined that training is necessary for the individual to obtain employment.

Under special circumstances and with proper justification, a request can be made to exceed the ITA funding limit, training duration or to authorize training in a not-in-demand or otherwise restricted occupation.

A completed Request for Exception form and appropriate supporting documentation must be submitted to the One Stop Manager for review. If approved, the request will be forwarded to the SWWDC for final determination.

ITA PAYMENT METHODS

The procurement of goods or services required for participation in training will be achieved by means of a voucher or purchase order.

- Vouchers are procurement mechanisms issued to cover the costs of training, and the cost of goods or services required for participation in training that are available from the training provider named on the ITA and listed on a state's Eligible Training Provider List (ETPL). The voucher form authorizes the named training provider to invoice the indicated funding source for the cost of tuition and materials necessary for program participation.
- Purchase Orders, and other normal procurement mechanisms, should be used by funding source to cover the costs of goods or services required for participation in training but are *not* available from the provider named on the ITA. Vouchers will be issued in increments appropriate to the training program (such as by quarters, semesters, or other training program durations) or appropriate to individual training provider's usual billing cycles. Continued issuance is contingent on satisfactory progress in training, as defined in this policy. In the event of unsatisfactory progress in training or change in availability of funds, an ITA may be revoked with notice to the customer. Training providers are required to inform the ITA funding source of a customer's known failure to maintain satisfactory progress.

The SWWDC reserves the right to make exceptions to this policy, on a case by case basis, should individual circumstances warrant exception.

EXCEPTIONS TO THE USE OF ITAs FOR THE DELIVERY OF TRAINING

The SWWDC reserves the right to implement the authorized exceptions to the use of ITAs in accordance with WIA Regulations. Contracts for qualified training services may be used under the following conditions:

- When the training services provided are for on-the-job training or customized training.
- When the Council determines there is an insufficient number of training providers in the region and the local workforce system must therefore, make use of all

- qualified training providers in order to maximize customers' choices of training options.
- When the Council determines there are training service programs of demonstrated effectiveness offered in the area by community-based organizations or other private organizations to service special participant populations that face multiple barriers to employment. Special populations that face multiple barriers to employment are populations of low-income individuals that are included in one or more of the following categories:
 - Individuals with substantial language or cultural barriers;
 - Offenders;
 - Homeless individuals; and
 - Other hard-to-service populations.
 - The Council's criteria for determining demonstrated effectiveness, particularly as it applies to the special participant population to be served, includes the following:
 - Financial stability of the organization;
 - Demonstrated performance in measures appropriate to the program including program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment and retention in employment; and
 - How the specific program relates to the workforce investment needs identified in the local plan.
 - If a training provider opts out of the eligible Training Provider List, the ITA shall be honored for the customers that are already enrolled and funded by an ITA at that institution. An ITA would not be modified or extended for a customer beyond the original plan approval for those training institutions that are no longer on the Eligible Training Provider List.

Definitions:

Employable: The customer currently has the skills, knowledge, and life circumstances that would allow them to obtain employment, to stay in employment and to move on in the workplace.

Self-sufficient Wage: A wage considered sufficient to meet the basic needs of the worker and their dependents as determined by the self-sufficiency calculators, individual job seeker, and case manager. Generally, this is interpreted as the hourly wage that the customer, working forty hours a week, would need to earn to be able to afford basic housing, food, utilities, transportation, and healthcare.

References/Resources:

- WIA and Final Rules: Section 134; 20 CFR Part 652, 663.420, 663.430
- Washington State WIA Policy #3655: Individual Training Accounts
- Washington State Eligible Training Provider List (ETP): www.wtb.wa.gov/etp/
- SWWDC Supportive Services Policy #3005
- SWWDC Veteran's Priority of Services and Eligibility Policy #3019
- Request for Exception form
- WIA Intensive & Training Services Reference Chart