

North Central Workforce Development Area

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LOCAL DIRECTIVE

Directive #: <u>18-171 (REV 2)</u> Date: <u>June 1, 2021</u>
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TO: SkillSource Staff and Service Providers

FROM: Dave Petersen, Executive Director

SUBJECT: Individual Training Accounts

SUPERCEDES: Directive #18-171 (Rev 1): Individual Training Accounts

Changes in this revision:

- 1) Inserts wording from 20 CFR 680.300 and TEGL 19-16 regarding the establishment of an ITA
 - 2) Specifies appropriate use of ITA funds when other training sources are involved
 - 3) Addresses exceptions to in-demand for registered apprenticeships
-

Attached is the local area policy and procedures manual for WIOA Individual Training Accounts (ITA). Per 20 CFR 680.300 and Section 7 of TEGL 19-16, an ITA is triggered through an intentional process between a WIOA Title I participant and the participant's WIOA Title I case manager. That process, which leads to the selection of a training provider eligible to receive WIOA Title I funds via an ITA, is a condition of establishing the ITA itself.

ITA training may only be delivered by providers on the State Eligible Training Provider List (ETPL). The ETPL must be made available during consultation with customers to maximize informed choice in selecting an eligible training provider.

Customers interested in receiving an ITA, must complete all SkillSource prerequisites as outlined in the procedures manual including assessment, Individual Employment Plan, ITA application and any other program specific prerequisites.

Please direct any questions regarding ITA procedures to your Program Manager.

References:

- [20 CFR 680.230](#)
- TEGLs [19-16](#)
- [WIN 5601 Rev 2](#)

North Central Workforce Development Area

INDIVIDUAL TRAINING ACCOUNT

Policy & Procedure Manual

Revised: June 1, 2021

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INDIVIDUAL TRAINING ACCOUNT POLICY & PROCEDURES

1. INTRODUCTION

Participants whose career goal requires formal classroom instruction may be granted an Individual Training Account (ITA) to enroll in Vocational/Occupational Skill Training.

Class based training is normally conducted in a classroom setting designed to ensure that individuals acquire the ability and knowledge necessary to perform a specific job or group of jobs in occupations for which there is a demand.

WIOA funds are intended to provide training services in instances when there is no grant assistance (or insufficient assistance) from other sources (i.e., Temporary Assistance for Needy Families (TANF), Basic Food Employment and Training (BFET), Title IV Programs and state-funded grants) to pay for those costs (20 CFR 680.310). The use of WIOA funds to pay down a loan of an otherwise eligible participant is prohibited; however, the mere existence of a federal loan must not impact eligibility determinations.

ITAs may be awarded up to \$6,000 (pending budget availability) to purchase training from providers that are on the State Eligible Training Provider List (ETPL). Besides Tuition, the account may include costs such as books, academic fees, supplies, tools, uniforms, test fees and other training related expenses, up to the scholarship award. These training related costs may be paid to the training institution through the ITA. Child care and other living expenses are separately calculated based on need, following referrals to other social service agencies. ITA applications are reviewed and authorized by the Training Manager according to local policy and annual budget parameters. ITAs are obligated per SkillSource contracting and obligation procedures and training progress is managed between the training consultant and the participant.

ITAs are granted based on quality of application, personal interview, motivation, availability of other grant resources, demonstrated performance, predicted employability, member of target group and demand for chosen occupation.

2. ELIGIBLE PARTICIPANTS

Class based training opportunities may be offered to participants who are unable to obtain employment through career services and lack the formal education required for their career goal. In some instances, ITA may also be used to upgrade existing skills. ITAs may be provided to Adults who are determined to be Priority 1-3. Priority 4 participants may be eligible for ITAs in medical related programs such as but not limited to: nursing, medical assistant, lab technician, etc. ITAs may not be issued to Adult customers with a previous Baccalaureate Degree. Exceptions may be approved by the Managing Director upon analysis of year degree was earned, applicability to current labor market demand and other applicable information.

3. ELIGIBLE TRAINING PROVIDERS

ITAs may only be used for purchasing training from providers on the Washington State ETPL. When a program of training is removed from the state Eligible Training Provider List (ETPL), WIOA participants in that program can complete their training (see [WIOA Title I Policy 5611](#)).

However, ITAs should not be modified or extended for those participants beyond the original plan approval as it relates to a program of training that is no longer on the ETPL.

When using a private vendor and where similar training is available from more than one vendor, training price is reviewed and rationale for contracting for a more expensive program is documented.

After issuing an ITA, either an ITA contract will be completed and/or a purchase order will be authorized and sent to the institution. Tuition, books, fees or other approved costs are usually paid monthly or quarterly.

Applicants needing short term prevocational services to obtain employment may be enrolled in courses or workshops as per Local Directive.

4. DEMAND OCCUPATION

ITAs are awarded for occupations for which there is a local labor market demand, or demand in an area to which the participant is willing to relocate. Consideration in the selection of training programs may also be given to training in occupations determined to be in sectors of the economy which have a high potential for sustained demand or growth. NCWDA utilizes the WDA [Demand/Decline list](#) in addition to other labor market information sources to determine occupational demand. ITAs may be awarded for participants in registered apprenticeships as such programs are considered in-demand regardless of the labor market information for that occupation.

5. LENGTH OF TRAINING

ITAs are limited to vocational or technical training programs that can be completed within two years. Dislocated Worker participants may complete professional courses needed to upgrade skills for employment. This would include completing a four-year degree that qualifies the participant for a specific profession, such as teaching or accounting.

Exceptions to the length of training limitations in individual cases (i.e., individuals with physical or sensory disabilities who may need their duration of training extended beyond the two year limit) may be made. Exceptions are authorized by the Training Manager.

6. GENERAL REQUIREMENTS

Class based training includes counseling about non-traditional careers (for those who express an interest and aptitude in these careers more information will be provided), loan repayment and assistance in applying for federal financial aide.

The Assessment for Career Employment (ACE) workshop is required for participants wanting to apply for ITA. This workshop is designed to provide career information, assess skills, build self-esteem and motivate individuals to successfully take charge of their lives. This workshop may be waived on an individual basis upon consultation with their Training Consultant and Training Manager. Acceptable reasons for waiving the ACE workshop requirement may include: participant has completed the first year of post-secondary education funded by other sources and needs financial assistance to finish.

7. ITA REQUIREMENTS

ITA candidates must meet the Workforce Innovation & Opportunity Act eligibility and local area priority requirements and show a financial need after completing the school funding worksheet. Dislocated workers may have tuition and books paid without completing a school funding worksheet, but case notes must address and account for any financial aid/grants the applicant is receiving.

Individuals interested in ITA must first complete a formal interview, assessment and participate in the development of an Individual Employment Plan (IEP) addressing topics such as assessment results, career awareness and labor market information, motivation, work maturity, etc. The assessment results are reviewed with a training consultant who will assist the applicant to select training in a vocation supported by their abilities and interests. The trainer will also provide the applicant information on eligible training providers to help them select the appropriate training provider.

Documenting Need for Training:

The participant file must contain a determination of need for training as determined through the interview, evaluation or assessment and career planning informed by local labor market information and training provider performance information, or through any other career serviced received.

As a result of interview, evaluation, assessment and career planning documented in IEP, the participant:

- is unlikely or unable to obtain or retain employment that leads to self-sufficiency, comparable wages, and
- is in need of training services to obtain or retain employment leading to self-sufficiency, and
- has the skills and qualifications to participate successfully in training, and
- has selected a program of training that is directly linked to local employment or relocation area, and
- is unable to obtain grant assistance from other sources to pay the full cost of training.

The need for the participant's chosen training must be recorded in case notes and IEP.

Application:

1. ITA applicants are required to complete an ITA application packet which includes: reasons for choosing their career and training provider, two employer interviews and an ITA agreement.
 - ITA applicants may be waived of the requirement to include two employer interviews in their application packet if they meet one of the following conditions:
 - a. They are already enrolled in an eligible training program and are requesting ITA for continuation funding of the training, or
 - b. They have been hired by an employer to take part in a registered apprenticeship training program.
2. Counselors assist applicants to seek all other financial resources available including, but not limited to: Pell Grants, State Need Grants, TANF, BFET, Title IV programs other grant resources, etc.

3. The use of WIOA funds to pay down a loan of an otherwise eligible participant is prohibited; however, the mere existence of a federal loan must not impact ITA eligibility determinations.
4. ITA candidates must have finished prerequisite courses and be accepted into the selected vocational program. Some exceptions may be made on individual basis and approved by the Managing Director as State policy allows for an ITA award to fund prerequisite training to a vocational training program if it is required by the educational institution.

8. ITA AWARDS & LIMITS

ITAs may be awarded up to \$6,000 (pending budget availability) to purchase training from providers that are included on the State Eligible Training Provider List (ETPL). ITA award amounts for Adults are determined when applicants complete the school funding worksheet. This worksheet takes into account all resources including, but not limited to: Pell grants (determined from the financial aid award letter and estimated for the second program year), wages, and public assistance payments. Training consultants then subtract the training and support costs including; books, tuition, supplies and other training related expenses.

Dislocated Workers are not required to complete a School Funding worksheet, but the ITA award must take into consideration other sources of grant funds being received by the applicant and documented in case notes. Likewise, if the applicant is not eligible for or receiving educational grant assistance, document in case notes.

Also included is a living allowance expense which is derived from the federal government's 100% lower living standard adjusted for family size. This ensures that all applicants are awarded ITAs based on necessary expenses and resources regardless of personal spending habits. Once the difference between resources and expenses has been calculated a training consultant will then award the ITA not to exceed the difference. Child care expenses will be considered outside the ITA award. ITAs may be modified as many times as needed in coordination with appropriate case managers and upon approval of Training Manager and Educational Institution.

If the training provider was selected by the participant and the training consultant, but the source of payment for training is Pell, other financial aid, or private scholarships, a WIOA-funded ITA may be used to pay allowable training costs not covered by those fund sources.

A WIOA-funded ITA is not appropriate if the training consultant and program played no role in training provider selection and the participant's training is selected, funded, and directed by a program other than Title I, such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA), or community and technical colleges (Worker Retraining (WRT)). However, if such funding ends after training has started, a WIOA Title I-funded ITA may be initiated if that program is on the Eligible Training Provider (ETP) list.

Individuals may select training that costs more than the maximum amount available for ITAs (based on locally established limits) when other sources of funds (e.g., Pell Grants, State grants, etc.) are available to supplement the ITA (20 CFR 680.310(d)). Examples of proper rationale for

contracting for more expensive training may include, but are not limited to: availability, timeline of training, measurable outcomes and placement services available to participants.

9. WORKFORCE PREPARATION ACTIVITIES

Workforce preparation activities help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, or training, or employment. These are distinct from occupational skills training requiring ITA by scope of instruction (usually do not lead to a degree or occupational certificate), length of time (usually 100 hours or less) and by low cost (usually less than \$1000). Examples include but are not limited to short term forklift certification, flagger or food handler certification, driver's education, computer applications, medical terminology, and other job specific employment preparation courses.

10. ON THE JOB TRAINING ENHANCEMENTS

Classroom training which accompanies on-the-job training must be funded through an ITA unless one of the following applies:

- 1) The OJT employer pays at least 50% of the classroom training cost.
- 2) The training is considered an Individualized Career service (workforce preparation activities).

11. FOLLOW-UP & SATISFACTORY PROGRESS

By accepting an ITA, participants agree to contact their training consultant at least once a month and provide a copy of their grades each grading period.

Participants must demonstrate satisfactory progress established by the Training provider, except for good cause, to access payments through their ITAs.

Good Cause - "Good cause" for failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress. Good cause includes, but is not limited to: a) Illness, injury or disability of the participant or a member of the participant's immediate family; b) Severe weather conditions or natural disaster precluding safe travel; c) Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant; d) Acting on advice received from an authority such as the training provider, instructor, or case manager; e) Training is delayed or cancelled; f) Accepting stop-gap employment with hours or other work conditions that conflict with the training; g) Accepting goal-related employment prior to completion of training.

Failure to comply with request, poor attendance or failure to meet school mandated satisfactory progress requirements may result in loss of ITA funding (i.e. termination of contract with training provider).

Participants also agree to stay in contact with their training consultant until they find a job; participate actively in job search; attend Job Search workshops as directed; and furnish follow-up information regarding their job placement.

12. EQUAL OPPORTUNITY

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity. The full nondiscrimination assurances can be found at 29 CFR Part 38.25.

13. ITA TUITION RECOVERY POLICY

Trainers will review the applicable training institutions' withdrawal & refund policy with each ITA applicant in order that they are fully informed of their responsibility to notify SkillSource in the event of their withdraw and to formally withdraw from the institution. The training manager's office will maintain a refund policy binder for vocational education providers used on a regularly occurring basis. For all other providers, trainers will obtain a copy of the refund policy and file in participant folder.

If a participant drops out and discontinues their training, Trainers must determine whether a refund is due based upon the applicable training institution's refund policy. SkillSource accounting and the training institution are then notified by the trainer via e-mail of the refund due. Accounting will follow-up with a formal notice to the training provider of refund due and begin debt collection procedures. Refer to local Debt Collection Directive.

INDIVIDUAL TRAINING ACCOUNT (ITA)

Specialized training in a vocational field may help you find that job you've always dreamed of! The Individual Training Account process will provide you with the information you need to make a self informed choice about your employment future - and the training to support your decision.

To be able to enter vocational training or retraining programs, there are several steps that must be completed. The goal of vocational training is to develop job specific skills that will lead to employment. This means that you must understand the training choices available to you, your suitability for this field, the jobs that you should be able to get with this training, the starting wages in this field, how long it will take you and how you will survive during this time of training. The attached documents will help answer these questions and insure your success in this opportunity.

CAREER CHOICE: It is important to research the career that you are interested in. It must be in a demand occupation. In other words there must be employment in that field at the end of your training. You will need to complete some labor market research to establish demand, prevailing wages and advancement opportunities for this occupation. You will need to explain why you have selected this area of study and training institution. To further research your chosen field, you will need to complete two interviews with employers in your designated vocation.

SCHOOL CHOICE: It is also important to research the schools and programs that lead to your career goal. Program completion and placement rates should be considered. You need to make an informed decision when you choose the school you wish to attend.

REQUIREMENTS:

1. You must successfully complete the ACE workshop, CareerScope assessment, and required college entrance exams (if applicable), unless waived by Training Manager
2. You must show that you have sought all other financial resources available including, but not limited to: Pell Grants, State Need Grants, TANF, BFET, Title IV programs other resources, etc.
3. You must have finished prerequisite courses and be accepted into the vocational program before your Training Account is valid, unless pre-requisite courses have been approved by the Managing Director. You must be able to maintain full-time student status as defined by the training institution, or complete the training program within a two year period, unless exception approved by the Training Manager.
4. ***You must be eligible and registered with SkillSource.*** You will be expected to fulfill participant responsibilities as outlined on the attached training agreement.

HOW TO APPLY: After your ITA orientation with your training consultant, complete the ITA application packet and return to:

***SkillSource
233 N. Chelan
Wenatchee, WA 98801
509/663-3091***

Application for Individual Training Account

Name _____
(Last name) (Middle Initial) (First Name)

Chosen vocational field of study _____

Name of school _____

Date you started, or plan to start school _____ Expected graduation date _____

Credits per quarter needed to graduate (if applicable.) _____

Describe special needs, expenses or circumstances you feel should be considered in your application:

Please explain why you have chosen your area of study and occupational goals.

Please explain why you have chosen this particular training program and/or school.

Return this completed application to the SkillSource office to be considered for a Training Account, with the following attachments.

- | | |
|--|---|
| <input type="checkbox"/> Signed Training Account Agreement information (Use attached form) | <input type="checkbox"/> PELL Grant and/or other financial aid |
| <input type="checkbox"/> Two completed Employer Interview Forms | <input type="checkbox"/> Proof of completed prerequisite courses (if necessary) |
| <input type="checkbox"/> Labor Market Research Results | |

Applicant Name _____

Employer Interview Form

Position you are researching: _____

Company Name: _____

Address: _____ Phone # _____

Contact person: _____ Title: _____

SUGGESTED QUESTIONS

What qualifications, skills, and personal characteristics do you seek in the ideal candidate?

Do you need education / training to be considered for this job? If so, what type? _____

Do you prefer graduates of particular schools or training programs? _____

Do you generally hire full-time for this position? _____

Does this job have any special requirements such as travel, shift work, special licenses, etc _____

How many openings do you anticipate in the next year? _____

What is your entry level salary range for this position? \$ _____

Could you please describe advancement opportunities? _____

Employer signature: _____ Date: _____

Training Account Agreement

By accepting the SkillSource training account, I agree to these conditions:

- ***I understand that the purpose of the SkillSource training account is for me to learn vocational skills required for employment in my chosen career field. I agree to complete training and endeavor to find employment within 90 days of the end of my training program.***
- I understand that SkillSource training dollars may be applied only to those classes necessary for me to complete my vocational certification or degree, license or other credential. I understand that any unused training account funds will be used to help others attend school.
- I understand that I must complete the training program within a two year period “unless an exception was approved by the Training Manager.”
- I understand that it is my responsibility to contact my Training Consultant at least once each month, and to provide a copy of my grade reports each grading period. I understand that I must demonstrate satisfactory progress in training, except for good cause (see Section 10 – ITA Follow Up for Definitions), to access payments through my ITAs. ***I realize that failure to do this, poor attendance, unacceptable grades, or unsatisfactory progress may result in the loss of this training account.***
- I agree to stay in contact with my Training Consultant after training completion and participate actively in a job search until I find a job, and to furnish information requested regarding my job. I understand I will be contacted regularly for up to a year after training is complete, and I agree to furnish information on my job including wages and benefits and to answer questions willingly and accurately.
- I understand that this program is not an entitlement, and that program funds may change from year to year.
- I hereby attest that I participated actively in evaluating this training program and school, and that the final choice to attend this training provider is mine.
- I have read and agree to abide by the training institution’s withdrawal and refund policy.

Training Account Applicant Signature _____ Date _____

Training Consultant Signature _____ Date _____



School Funding Worksheet

Name _____

Phone _____

Area of Study _____

School _____

Number of months left in school _____

Family Size _____

Number of children needing daycare _____

Full Time _____ Part Time _____

Resources	Expenses
<p>Monthly Resources</p> <p>Grants: \$ _____ Per quarter Divided by 3 mos/qtr = \$ _____ per mo.</p> <p>Cash P.A. _____ per mo.</p> <p>Food Stamps _____ per mo.</p> <p>Wages (take home) _____ per mo.</p> <p>SSI _____ per mo.</p> <p>Child Support/Alimony _____ per mo.</p> <p>Other _____ per mo.</p> <p>Total Monthly Resources \$ _____ per mo. X _____ (months left in school) =</p> <p>Total Resources \$ _____</p>	<p>Totals for Remaining Time in School</p> <p>Tuition _____</p> <p>Books/Supplies _____</p> <p>Fees _____</p> <p>Tools _____</p> <p>Total School Expenses A \$ _____</p> <p>Monthly Expenses</p> <p>Childcare per month _____</p> <p>6 month 100% LLS for Family Size of _____ = _____ Divided by 6 = Monthly LLS amount _____</p> <p>Other _____</p> <p>Total Monthly Expenses \$ _____ X _____ months left in school = B \$ _____</p> <p>Total Expenses (A+B) \$ _____</p>

Total Resources \$ _____ - (minus) Total Expenses \$ _____ = Total Need \$ _____

SkillSource Award \$ _____ Remaining need _____

Plan to meet remaining need _____

Student Signature _____ Date _____

Training Consultant Signature _____ Date _____