



**Workforce
Development
Council**

**Benton-Franklin Workforce Development Council
Workforce Innovation and Opportunity Act (WIOA)**

**Subject: Individual Training Accounts (ITA) and
Pre-Vocational Services**

Policy No: 2015-04

Effective Date: 2/24/16

Revision: 01/24/2017

1. Purpose:

This policy provides guidance on Individual Training Accounts (ITAs) for training services provided under Title I of the Workforce Innovation and Opportunity Act (WIOA Section 134(c)(3)(G)).

2. Background:

Funding of certain WIOA Title I training services for adults, dislocated workers, and out-of-school youth ages 16-24 are provided through ITAs. Using ITA funds, WIOA Title I adults, dislocated workers, and youth, when appropriate, purchase training services from eligible training providers they select in consultation with an employment counselor. Individuals are expected to utilize information that is provided (e.g., skills assessment, labor market conditions/trends and training vendor performance) to take an active role in managing their employment future through the use of ITAs. Individuals are expected to make a self-informed choice about their own employment future and the training services needed.

Policy & Procedure

A. Individual Training Account (ITA)

Participants are expected to take an active role in managing their employment future through the use of ITAs among other resources. Training services are not entitlements and shall be provided to participants, who at a minimum, receive either an interview, evaluation, or assessment, and career planning and are determined to be unlikely or unable to obtain or retain employment that leads to self-sufficiency through career services alone. The Individual Participant Plan 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.

There is no requirement that career services be provided as a condition to receive training services; however, if career services are not provided before training, documentation must explain how the participant's eligibility for training services was determined.

An ITA may be established on behalf of an adult, dislocated worker and youth (out-of-school youth ages 16-24) participant to purchase training services from eligible training providers. Payments from ITAs may be made through a purchase order system or other appropriate method. The PO or voucher should document a three-way commitment between the individual, service provider, and training institution. As a three-way contract, this PO or voucher could obligate funds for the Program Year (PY). If additional ITA funds are required beyond the PY (two-year cycle) and are needed by the individual in order to complete his/her training plan, a new PO or voucher could be awarded at the beginning of the next PY. Payments may also be made incrementally through payment of costs at different points in the training course. This PO or voucher system could document deobligations as individuals receive additional resources and/or leave the training program prior to completion.

Training services are provided to equip individuals to enter the workforce and retain employment. Training services may include:

- Occupational skills training
- On-the-Job Training (OJT)
- Registered apprenticeship which incorporates both OJT and classroom training
- Pre-apprenticeship training
- Workplace training with related instruction
- Training programs operated by the private sector
- Skill upgrading and retraining, entrepreneurial training, and transitional jobs

B. Funding ITAs

The funding level of Individual Training Accounts shall be determined on a case-by-case basis and shall be limited to the needs identified in each participant's Individual Participant Plan contingent of the availability of funds.

All ITAs will be limited to a maximum amount of up to \$10,000, which does not include support services, but does include tuition, books, course required software, lab fees and

other associated costs. The \$10,000 maximum (ceiling) amount is considered to be the ITAs lifetime participant limit within all WIOA Programs. ITAs may average far less than the prescribed maximum amount of \$10,000, depending upon the individual customers need. ITA vouchers will be written for specific amounts that partially or fully support the overall goal of the customer's training plan. If a registered participant satisfactorily completes one ITA curriculum, but consistent with the overall goal of the training plan requires an additional ITA, and the amount required remains below the \$10,000 limit, an additional ITA can be written. Waivers to ITA limits may be considered under special circumstances by submitting a written request to the BFWDC.

When awarding an ITA, consideration must be given to the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not replace other sources. 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.

C. Duration of Training Services

The duration of Individual Training Accounts shall be determined on a case-by-case basis and shall be identified on the ITA.

D. Satisfactory Progress in Training

Participants are required to make satisfactory progress in training (WAC 192-270-065), except for good cause (see Section P – Definitions) to access all payments of their ITAs. Satisfactory progress is defined as follows:

- The participant's grade point average does not fall below 2.0 for more than two consecutive quarters or semesters;
- The participant maintains a grade point average sufficient to graduate from, or receive certification in, their approved area of study; and,
- The participant is completing sufficient credit hours to finish their approved course of study within the time frame 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.
- The participant must provide the employment specialist with transcripts for each school term or a summary of progress from training providers that do not use letter or number grades.

E. Eligible Training Providers

Eligible providers of training services are entities that are eligible to receive WIOA Title I-B funds. These potential providers may include:

- Institutions of higher education that provide a program which leads to a recognized post-secondary credential;
- Entities that carry out programs registered under the National Apprenticeship Act
- Other public or private providers of a program of training services, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under title II if such activities are provided in combination with occupational skills training; and
- Local Boards who meet conditions of WIOA Section 107(g)(1).

An ITA can only be issued for training provided by an eligible provider of training services whose course program is on the Washington State Eligible Training Provider List (ETPL) posted on the Internet at www.careerbridge.wa.gov.

Participants will have access to the list of eligible providers through the One-Stop system. Participants must be able to select WIOA training services by any of the eligible training providers and programs from any of the local areas on the State list.

F. Out-of-State/Out-of-Area Providers

All training programs must be within a reasonable commute of the BFWDC area. Out-of-area training programs that are not within commuting distance to the BFWDC local area, may be approved on a case-by-case basis pending the participant demonstrating the ability to incur all extraordinary costs, e.g., 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.

When a program of training is removed from the State Eligible Training Provider List, the ITA shall be honored for the participants that are already enrolled and funded by an ITA at that institution (see WIOA Title I Policy 5611). ITAs should not be modified or extended for participants beyond the original plan end date as it relates to a program of training that is no longer on the ETPL.

G. Prerequisite Training

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. Training which is either a prerequisite or a pre-vocational training may be considered an individualized career service.

H. Demand Occupations

Consideration must be given to labor market demand in the local area or area to which the trainee intends to relocate. Training will be limited to skills relevant to demand occupations. Training services may be approved for occupations that the local board has determined to be in sectors of the economy that have a high potential for sustained growth and/or where documentation indicates employment prospects in the local area in addition to those occupations on the demand list.

I. Disability Waivers

In individual cases, the BFWDC may extend the duration of training for individuals with physical or sensory disabilities or other unusual circumstances when it has been determined that training is necessary for the individual to obtain employment.

J. Registration Time Limit

Once a participant is awarded an ITA, local policy dictates that the participant must be enrolled in approved classes/training within 30 days from the approval of the ITA. ITAs will not be used for payment of late fees caused by customer error or delay. The customer will be responsible for these fees, as he/she is responsible for other fines or penalties.

K. Communication with Participants

The workforce system employment specialist will provide regular counseling to participants enrolled in approved training and awarded an ITA. Counseling will include information deemed relevant/pertinent to the participant by the employment specialist.

L. Modified IPP/Subsequent ITA

A participant may only modify their Individual Participant Plan with approval from the employment specialist. Second and subsequent ITAs can only be awarded to a participant if approved by the employment specialist with justification that supports further training is needed in order for the participant to obtain employment.

M. Availability of Funds Disclaimer

Training resources for participants are contingent upon the availability of funds provided by WIOA. Participants will be notified as soon as possible if a WIOA program will have insufficient funds to continue payments for tuition and fees.

N. Exceptions to ITAs

The Benton-Franklin Workforce Development Council (BFWDC) reserves the right to implement authorized exceptions to the use of ITAs in accordance with WIOA Section 134 (c)(3)(G)(i) and (ii). Contracts for training services may be used under the following conditions:

1. When the services provided are on-the-job-training, customized training, incumbent worker training, or transitional jobs;
2. The Local Board recognizes there are an insufficient number of eligible providers in the local area and must make use of other qualified training providers in order to maximize customer choice of training options.
3. The Local Board determines there are training service programs of demonstrated effectiveness offered in the area by a community-based organization (CBO) or other private organizations to serve individuals with barriers to employment. The Local Board's criteria for determining demonstrated effectiveness, particularly as it applies to the special participant populations to be served, may include:
 - 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.
4. The Local Board determines that it would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in an in-demand industry sector or occupation and such contract does not limit customer choice.
5. When the Local Board is considering entering into a pay-for-performance contract consistent with § 683.510.

Individuals with barriers to employment include those individuals in one or more of the following categories, as prescribed by WIOA Section 3(24):

1. Displaced homemakers;
2. Low-income individuals;
3. Indians, Alaska Natives, and Native Hawaiians;
4. Individuals with disabilities;
5. Older individuals, i.e., those aged 55 or over;
6. Ex-offenders;
7. Homeless individuals;
8. Youth who are in or have aged out of the foster system;
9. Individuals who are English language learners, individuals that have low levels of literacy, and individuals facing substantial cultural barriers;
10. Eligible migrant and seasonal farmworkers, defined in WIOA Section 167 (e);
11. Individuals within two years of exhausting lifetime eligibility under TANF (part A of title IV of the Social Security Act);
12. Single-parents (including single pregnant women);
13. Long-term unemployed individuals;
14. Other groups determined by the Governor to have barriers to employment.

O. Pre-Vocational Services

Short-term pre-vocational services are designed to prepare a participant for work, but do not provide formal occupational skills training. As such, they generally are not appropriate for an ITA. Short-term pre-vocational services are less than 40 instructional hours or at a cost of \$500 or less.

Short-term pre-vocational services include development of learning, communication, interviewing, punctuality, professional conduct, personal maintenance skills and pre-apprenticeship programs to prepare individuals for unsubsidized employment or training.

P. Definitions

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:

1. Illness, injury or disability of the participant or a member of the participant's immediate family;
2. Severe weather conditions or natural disaster precluding safe travel;
3. Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant;
4. Acting on advice received from an authority such as the training provider, instructor, or employment specialist;
5. Training is delayed or cancelled;
6. Accepting stop-gap employment with hours or other work conditions that conflict with the training;
7. Accepting goal-related employment prior to completion of training.