

Policy Number: P – WIOA – ITA – 1.B Effective Date: November 1, 2016 Revision Date: December 1, 2022 Approved By: Nick Schultz, Executive Director

Individual Training Accounts (ITA)

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 16-24, as appropriate. This policy revision supersedes policy number P-WIOA-ITA-1.A.

BACKGROUND

Under WIOA Title I, training services may be provided to WIOA Adults, Dislocated Workers, and Youth through ITAs. ITAs may be established on behalf of eligible individuals to fund occupational skills training from the state and local approved Eligibility Training Provider List (ETPL). Participants are expected to utilize information such as skills assessments, labor market conditions/trends, and training providers' performance and to take an active role in managing their employment future through the use of ITAs.

POLICY

ITAs, also referred to as Training Scholarships, are one training option that 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 or higher wages from previous employment through career services alone.

ITAs are not an entitlement and shall 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 skills recognized by employers.

Under WIOA, ITAs will be used when training at no cost cannot be found. All other training options and funding sources shall be exhausted prior to utilizing WIOA ITA funds.

An ITA is limited in cost and duration and must result in employment leading to economic selfsufficiency or wages comparable to or higher than wages from previous employment. Participants may access training services through Training Providers who have met eligibility requirements on the state managed Eligible Training Provider List (ETPL). As the local Workforce Development Board, Pacific Gateway has additional eligibility requirements to ensure the trainings provided are in occupations with regional growth projections and locally sustainable wages, as well as meeting the needs of the region's employers.

All training providers listed on the Pacific Gateway WDB's approved list are also included on the state approved Eligible Training Provider List (ETPL). ITAs are authorized only for training programs listed

on the state and local ETPL, as required by WIOA Section 134 (c)(F)(III). Registered Apprenticeship programs automatically qualify to be on the list of eligible training providers as long as the Registered Apprenticeship program remains registered. ITAs may also be used for pre-apprenticeship programs; however, only pre-apprenticeship programs listed on the ETPL may be approved. ITAs may be authorized for online training if the training program is listed on the ETPL.

A. Eligibility Criteria for Training

- 1. The participant is unemployed or employed at a wage below the self-sufficiency level consistent with the WDB's approved policy. The participant is unlikely or unable to obtain or retain employment.
- 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 to successfully complete the desired training program.
- 4. The participant has a GED or high school diploma and a 9th grade reading and math comprehension level. A Program Manager may grant approval to waive these requirements for specific occupational skills 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 or sources to cover the cost of training, including Pell Grants.
- 7. The participant has not attended or completed Pacific Gateway WIOA funded ITA training within the last 24 months. Pacific Gateway's Workforce Development Officer has the authority to waive these requirements if proper justification has been provided.
- 8. The participant selected an eligible training provider in consultation with the Career Specialist listed on Pacific Gateway's local training providers list.
- 9. The participant completed the ITA Scholarship application and submitted the required documentation for review and approval.

B. <u>Selection of Training Providers</u>

WIOA program staff will assist participants in making well-informed training decisions and provide guidance in selecting a training facility and specific program from vendors currently on the state ETPL and local ETPL, as required by WIOA. Exceptions to the ETPL requirement may occur where special grant funding allows for flexibility.

Pacific Gateway has the authority to 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 listed on the CA and local approved ETPL.

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

If the training program selected is online, the participant must have consistent access to the internet, a computer, and any necessary equipment to complete the course. The Career Specialist must document the reason for selecting an online course in the CalJOBS case note.

C. Funding and Duration Limit

The maximum ITA amount is \$7,500 per customer. In general, training should not extend beyond twelve (12) consecutive months but can, in some instances, extend to eighteen (18) months or exceed \$7,500 with authorization by the Workforce Development Officer. Exceptions may occur where special grant funding allows for flexibility.

Prior to receipt of an ITA, the availability of other financing for training services shall be exhausted, including Pell Grants and other grant assistance (excluding loans). WIOA program staff are responsible for documenting if the training provider and training program qualify for financial assistance and the eligibility/ineligibility for grant assistance.

Participants may use other sources of funds to cover training costs that exceed \$7,500. The leveraging of funds for the participant covering the entire training or payment above the \$7,500 in training fees should be documented on the ITA Scholarship (Exhibit A).

Participants must access their ITA forty-five (45) days from the date of issuance. Exceptions may be permitted due to unexpected circumstances that prevent the participant from accessing the ITA (i.e., program scheduling constraints) upon authorization from the Program Manager.

Funds expended on a training program for any individual shall be determined as fulfilling the training agreement, whether that amount meets the maximum amount or not.

ITA funds are used for tuition costs, required books, fees, specialized course-specific supplies or activities. An ITA may fund prerequisite training if the approved training program requires it. ITAs can also support placing eligible participants in registered apprenticeship programs and pre-apprenticeship training.

D. ITA Review and Approval Process

WIOA program staff are responsible for verifying an ITA Application is complete and pre-approved by the Program Manager. The ITA application must demonstrate the participant's knowledge of the training program, knowledge of job requirements, knowledge of the targeted demand occupation in the local area or proposed area of employment, and commitment to completing the training program.

The Training Coordinator is responsible for verifying that procurement, contract, and fiscal requirements have been met before submission to the Workforce Development Officer for final approval. ITAs must be approved by the Program Manager and Workforce Development Officer (or designee), prior to a participant beginning training. In addition, the Training Coordinator is responsible for ensuring the Fiscal Unit has received a copy of the approved ITA Application and that the ITA has been entered on the ITA Log and the appropriate training activity entered in CalJOBS.

Any changes to the ITA must be documented on a modified ITA Scholarship and submitted to the Program Manager for approval. The Training Coordinator is responsible for communicating such changes to the Fiscal and Data Management Units.

E. ITA Modifications

An ITA may be modified to ensure the individual attains their educational goals and subsequent employment. In some circumstances, such as when a training program is removed from the ETPL, or when extraordinary program expenses develop, the participant and Career Specialist must agree on whether to complete the plan of training with the existing provider, seek a similar program, or discontinue training. When a training program is removed from the state ETPL, WIOA participants in that program can complete their training. However, an ITA should not be modified or extended for a participant beyond the original approved plan for a training program that is no longer on the ETPL.

F. ITA Invoicing

To be eligible for payment, training providers must submit all invoices accompanied by the required attendance records, progress evaluations, transcripts, MSGs, certificate of completion(s), and all supporting documents, as agreed on the Educational Agreement, for review and verification, prior to the issuance of payment.

G. 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. WIOA program staff are responsible for immediately notifying the Training Coordinator and the Program Manager when there is an early termination of a participant's training. The Training Coordinator will notify the Fiscal and Data Management Units and update the ITA Log to reflect the early termination of training. The WDB's Fiscal Unit is responsible for the collection process of any outstanding training and/or tuition refund. Refund requirements for training providers are outlined in the Educational Agreement and the WDB's Recovery of WIOA Tuition and Training Refunds policy (<u>P-WIOA-RTTR-1.A</u>)

The training provider is also required to report early terminations of participants' training to the Training Coordinator. All refunds of unearned training funds must be returned promptly to Pacific Gateway from the training provider.

Training providers are required to refund all or a portion of the cost of the training if a participant does not complete the program or for any overpayment of program costs. Unless otherwise indicated by the training provider refund policy, refunds are based on a proration of services provided, which is calculated by the percentage of training hours completed. Each hour of training equates to a dollar amount.

H. Appeals Process

Participants have the right to appeal if they are denied training. If they believe they have been unfairly denied access to training through an ITA, they may file an appeal using Pacific Gateway's Grievance and Complaint Procedures (P-WIOA-GCP.2.A).

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
- Workforce Services Directive WSD19-10 "Recovery of WIOA Tuition and Training Funds" (February 20, 2020)

- Pacific Gateway Self-Sufficiency Standard Policy P-WIOA-SSS-1.A
- Pacific Gateway Recovery of WIOA Tuition and Training Funds Policy P-WIOA-RTTR-1.A
- Pacific Gateway Grievance and Complaint Procedures Policy P-WIOA-GCP-2.A

INQUIRIES

For questions or assistance related to this policy, please contact the Pacific Gateway Workforce Development Board staff at (562) 570-3748.