

<u>MESA COUNTY WORKFORCE DEVELOPMENT BOARD</u>	
Policy and Procedure	
Title: Individual Training Account (ITA) Policy Program: Career Development Program (WIOA)	State Policy Guidance Letter: WIOA-2015-09 Effective Date: 10/17/2016 Revision Date: N/A
Authorized Signature(s):	

I. REFERENCE(S):

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Sections 108 and 134(c)(3).
- WIOA Department of Labor-Only Final Rule (81 FR 56072, Aug. 19, 2016).
- Veterans’ Program Letter (VPL) 07-09, Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor.
- Policy Guidance Letter (PGL) WIOA-2015-06, Eligible Training Providers for WIOA Title I Adult and Dislocated Worker Programs.

II. PURPOSE:

To provide guidance to the Career Development Program (WIOA) regarding policy and procedure for Individual Training Accounts.

III. POLICY/ACTION:

A. General ITA Requirements:

Under Title I of WIOA, training services must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider. The Career Development Program (WIOA Title I contractor), will make the Eligible Training Provider List (ETPL) available to customers during one-on-one interviews, and by sharing ETPL site access information with customers who would like to research training providers on their own. Eligible individuals may select training services from the ETPL, in consultation with a case manager, in order to maximize informed customer choice. The Career Development Program will refer the individual to training and coordinate payment with the eligible training provider through an Individual Training Account (ITA). The ITA is a payment agreement established on behalf of a participant with a training provider. Only those training providers that are on the State’s ETPL, and are approved for use of WIOA funding, are able to redeem ITAs for payment.

ITAs will not be issued to any individual in default of a student loan. The customer must have the default status removed prior to the approval of WIOA funding. An ITA will not typically be issued to a participant without a GED, High School Diploma or equivalent. Exceptions may be made on a case by case basis with approval from Career Development Program manager and/or director. Participants utilizing an ITA for WIOA funding must maintain at least a 2.0 cumulative GPA (on a 4.0 scale), or meet the training institution’s minimum academic requirement.

Academic probation will suspend the ITA until such time that the student is no longer on academic probation.

All ITAs require signature approval from the Career Development Program's manager and/or director. All case managers in the Career Development Program are authorized to issue ITAs once approved. Once an ITA is authorized, WIOA training funds will be tracked in the Great Plains accounting system as obligated and spent. An estimated cost will be set to obligate WIOA funds, and when final training costs are established, actual spent funds will be entered. If obligated/estimated funds exceed the actual spent funds, only the true final total of training expense will be pulled from the WIOA Title I funds. ITA authorizations will also be tracked in Connecting Colorado with an "OC" service to indicate that a training service is being paid for, along with begin and end dates that should match begin and end dates of training on completion documents. This ITA policy will coordinate with the Adult Priority of Service policy, and the Career Development Program will ensure that adult priority of service is being utilized during authorization of ITAs/training funds.

In order to enhance individual participant choice in their education and training plans and provide flexibility to service providers, the U.S. Department of Labor (USDOL) allows ITAs for out-of-school youth, ages 16 to 24, using WIOA youth program funds when appropriate.

B. Informed Customer Choice:

Training services, whether accessed by ITAs, or under contract, will be provided in a manner that maximizes informed consumer choice in selecting an eligible training service provider in accordance with the goals and objectives outlined in the client's individual employment plan. Workforce center staff assists the customer with career choices; however, the ultimate decision rests with the customer. Priority consideration shall be given to programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area as identified by the local board through the use of EMSI, (Labor Market Index (LMI), and Local Supply Demand Reports.

After general eligibility documentation has been collected, a participant may be served with career services. Labor market and ETPL information may be shared at this time during a one-on-one interview in person or on the phone, and if it is determined that the participant requires training to obtain employment through an initial and comprehensive assessment, WorkKeys Assessments may be administered to determine that the participant's skill set is at a capable level of completing training successfully. A second interview will take place to gather all required ITA and training documentation to justify financial assistance needs.

C. Coordinating ITAs with Other Sources of Funding:

WIOA funding for training is limited to participants who are either unable to obtain grant assistance from other sources to pay the costs of their training; or require assistance beyond that available under grant assistance from other sources to pay the costs of such training. The Career Development Program (WIOA) will consider the availability of other sources of grants/funding to pay for training costs so that WIOA funds are used to supplement other

funding sources. They will coordinate funding for ITAs with funding from other Federal, State, local, or private job training programs or sources, including Federal Pell grants, to assist the individual in obtaining training services. In making the funding determination, the Career Development Program (WIOA) will take into account the full cost of participating in training services, including the cost of support services and other appropriate costs. It will be the sole responsibility of applicants to submit documentation of the award and acceptance of Federal, State, local, or private financial assistance to the Career Development Program during the eligibility determination period for training. ITAs will not be issued to any individual in default of a student loan. The customer must have the default status removed prior to the approval of WIOA Title I funding.

A WIOA participant may enroll in WIOA-funded training while an application for a Pell Grant is pending as long as the Career Development Program (WIOA) has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse to the Career Development Program for the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses. Should the student not complete the program for any reason, the standard refund policy of the provider institution will apply and the resulting refund will be applied to the program funds from which the original obligation was made.

Training benefits funded by the Veterans' Administration are not included in the category of "grant assistance from other sources" and eligible veterans and spouses are not required to coordinate their entitlement to those benefits with their eligibility for WIOA-funded training.

D. ITAs In Conjunction with On-the Job Trainings (OJTs) or Registered Apprenticeship:

ITAs may be provided to individuals in conjunction with On-the-Job Training (OJT) funds when appropriate, and the ITA may be used before, during, or after an OJT. Registered apprenticeships automatically qualify to be on a State's ETPL, but may not always be listed on the ETPL because apprenticeship programs may choose whether to be included. ITAs can be used for the following apprenticeship-related costs:

1. Tuition, books, and related for pre-apprenticeship training;
2. Tuition, books and related for classroom training that is part of the apprenticeship;
3. Supportive services.

E. Exceptions to the ITA and the ETPL Requirements:

There are several exceptions to the required use of an ITA for training. In situations covered by these exceptions, a contract for services may be used to provide for training in lieu of an ITA or in combination with an ITA:

1. On-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience, and transitional employment are not included on the ETPL and

therefore are not subject to the eligibility requirements.

2. Should the Mesa County Workforce Development Board determine there are an insufficient number of eligible providers in the local area to accomplish the purpose of an ITA, the local plan and local policy will describe how this determination was made and the process used for contracting for services. This process will include a public comment period for interested providers of at least 30 days.
3. If the Mesa County Workforce Board determines that a community-based organization (CBO) or nonprofit whose primary mission is to serve individuals with barriers to employment provides effective training services, the Mesa County Workforce Board will develop criteria in local policy to determine that the program is effective. Criteria may include:
 - a. Financial stability of the organization;
 - b. Demonstrated performance in the delivery of services to individuals with barriers to employment through 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;
 - c. How the specific program relates to the workforce investment needs identified in the local plan; and
 - d. Other criteria determined by the local board.
4. When the Local Board determines that it would be most appropriate to contract with an institution of higher education or other eligible provider of training services to facilitate training for multiple individuals in in-demand industry sectors or occupations, as long as the contract does not limit the individual's consumer choice. In this exception, the training provider must still be on the ETPL.

F. ITA Limits:

1. A funding cap of \$5500 per enrolled client is set for training, and associated training/tuition expenses such as fees, equipment/equipment usage, other education materials when included in billing for training/tuition expense. All other expenses not attached to training/tuition will be considered support service and paid for with support service vouchers. This is not a guarantee of \$5,500, but a maximum funding based on the actual costs of the approved training course/program, and financial assistance need of client.
2. Funding will be spread across the entire length of the program by semester/term or other standard billing time frame established by the eligible training provider.
3. The length of an ITA will be limited to a maximum of 12 months. However, longer ITAs will be evaluated on a case-by-case basis, and with signed approval from the Career Development Program's manager and/or director.

G. Documentation:

1. The Career Development Program must document that a training program was on the ETPL in approved status for WIOA funding at the time that training is approved by the local area. The individual's case file must include a screen shot or printout that shows the WIOA approved program on the ETPL.
2. The individual case file must contain a copy of an ITA commitment or agreement document and supporting training source documentation (billing invoice, receipt, etc.) that identifies at a minimum the training cost, the provider and program, and start and end dates for the training.
3. The individual case file must contain documentation that the training program is attached to a career field in demand. Appropriate documentation will include Local Supply Demand Report, Industry Employment & Projections data from the Colorado Department of Labor and Employment (CDLE) LMI (Labor Market Index) Report, and Occupational Employment Projections data from CDLE LMI Report. When demand cannot be substantiated for a specific training, a letter of hire from an employer may be utilized to support demand for an ITA. The letter of hire must be printed on company letter head, written and signed by a company representative that can make hiring decisions, and must contain contact information for that company representative to be contacted for verification.
4. The individual case file must contain documentation of the outcome of the applicants' receipt/acceptance for other financial assistance sources, such as Federal Pell Grant. This will be utilized to determine the need for WIOA training funds, as well as the amount if need is determined.
5. The individual case file must contain a completed Individual Training Account Approval/Denial Documentation Checklist, and as deemed necessary by the case manager, a Financial Budget Worksheet. These documents, as well as case notes will be used to determine the issuance of an ITA for training. Case notes will explain the training-related financial assistance need from WIOA funds, an explanation of how the needs are being determined, and a description of how other funding assistance may be blended with WIOA funds, if utilized.

H. Internal Monitoring Procedures for local ITA system:

The designated MIS staff member of the Career Development Program will conduct 100% monitoring of ITA payment documents and data entry in Great Plains and Connecting Colorado to ensure accuracy of payments and services. Once a year, the Department of Human Services Professional Standards Team will conduct a monitoring review of the Career Development Program's (subcontractor Hilltop Community Resources) ITA system to ensure accuracy and consistency with local ITA policy and State PGL.