



# Spokane Area Workforce Development Council

## **CLASSROOM TRAINING: INDIVIDUAL TRAINING ACCOUNT & PRE-VOCATIONAL TRAINING POLICY**

Workforce Investment Act Policies and Procedures

### **POLICY #W408**

Effective Date: June 10, 2014

#### **PRE-VOCATIONAL TRAINING POLICY:**

Short-term pre-vocational classes are intended to develop learning skills, and are often required as a knowledge and/or skill base. Pre-Vocational training is limited to classes that address learning, communication, interviewing, punctuality, personal maintenance skills, and professional conduct. Within the definition of pre-vocational services, the major determinant for award is a cost of less than \$1,500 and no longer than six months, with extension allowable on a case-by-case basis authorized at the contractor management level. Pre-vocational training services are Intensive level, and are funded separately from Individual Training Accounts.

#### **INDIVIDUAL TRAINING ACCOUNT POLICY:**

Under the Workforce Investment Act (WIA), Title I-B individual classroom training services are provided through Individual Training Accounts (ITAs). Individuals are expected to take an active role in managing their employment future through the use of ITAs, and must have access to the information they need to make informed choices, including access to skill assessments, information about labor market conditions and trends, and training vendor performance information.

Regulations allow states and/or local Workforce Development Councils (WDC) to impose limits on the dollar amount and/or duration for ITAs. According to WIA [20 CFR Part 652. 663.420 (a) and (b)], WDCs have two options, including:

- There may be a limit for an individual participant that is based on the needs identified in the Individual Employment Plan (IEP); or
- There may be a policy decision by the WDC to establish a range of amounts and/or a maximum amount applicable to all ITAs.

The ITA is a Training service established on behalf of Adult or Dislocated Worker participants. An IEP does not constitute an obligation of the ITA award. An ITA may be awarded based on the following: availability of funds, a thorough individual assessment, and determination by case management that training services are needed and are appropriate. ITAs must be linked to occupations that are listed as "In Demand" per the current Spokane WDA Demand/Decline Occupations List (Demand/Decline List). Training in occupations that are "Balanced" require justification and program management approval. All participant files must contain a printout showing the training on the Demand/Decline List that is current at the time training funds are authorized. Training in occupations that are "Not in Demand" require approval by the Spokane Area Workforce Development Council (SAWDC). The SAWDC will regularly review petition letters submitted by program management regarding why a specific occupation should be categorized differently. Should the SAWDC find reasonable cause, the occupation will be changed and program staff will be notified.

Using ITA funds, qualified individuals may select to participate in training from providers on the Eligible Training Providers List in consultation with a case manager. Payments for ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods with approval by the SAWDC. Payments may also be made incrementally, paying a portion of the costs at different points in the training course.

When awarding an ITA, program staff must consider how to combine the ITA with other appropriate and applicable grant resources (excluding loans) that may be available, such as Pell Grants, tuition assistance/exemption, employer-training subsidies, apprenticeship dollars, and funds from other state/federal programs. The ITA can be used to pay for tuition, testing fees, books, fees, and other educational materials or supplies, but ITA funds may not be used for late fees/fines incurred by participant error or delay.

It is the intent of the Spokane Area Workforce Development Council that when a student receives both WIA and other financial aid, regardless of the order in which the funding is received, WIA will be applied to tuition, books, fees, and related supplies, while Pell and other aid will be used for room, board, and additional unmet need. If a WIA participant's need has been met through Pell and other alternative funding sources, the training program is required to return WIA funds to the contractor of record (such as WorkSource Spokane).

It is the intent of the SAWDC to primarily use ITA dollars to help participants make wage progression and gain a livable wage job. Priority must be given to enrolled eligible veterans and their spouses under the Jobs for Veterans Act. Other legislative guidelines also provide that priority shall be given to recipients of public assistance and other low income individuals for Adult programs where funding is limited.

Access to Workforce Investment Act funding is not an entitlement. The exact mix of funds should be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid for, with a variety of funds sources, if necessary, and that supportive services are available so that the training can be completed successfully.

#### Spokane WDC ITA Guidelines

For Spokane County, the Spokane Area Workforce Development Council has established the limits as follows:

- The maximum limit (cap) established for ITAs is \$5,000. This funding can be used for training and associated costs, but does not include supportive services, which can be provided in addition to an ITA. The \$5,000 is an ITA participant lifetime limit. Exceptions can be approved by program management based on individual circumstances, economic conditions, and potential return on investment. Additionally, some WIA grants may allow for higher maximum caps, such as Governor's Discretionary Grants. Such cases will be noted in the participant file.

Generally, individuals are expected to start training within 60 days of the award of an ITA, and programs funded by ITAs must be completed within 2½ years; extenuating circumstances may be considered if that timeframe is not met.

Individuals are expected to maintain satisfactory progress in the selected training program. Satisfactory progress is defined as:

- Maintaining a grade point average sufficient to graduate from and/or receive certification in their approved area of study; and/or
- Completing sufficient credit hours to complete program in the timeframe established in the ITA.

Program Operators (ITA brokers) are required to maintain policies/procedures which describe the following:

- ITA obligations require program management's review and approval.
- WIA case managers are to monitor ITAs with the training institute quarterly to determine if the participant has received additional resources or has left the training program prior to completion, in which case, the ITA must be modified or deobligated.

- Modifications to the ITA will not be limited but do require management approval. IEP must also be updated with ITA modification detail.
- A process describing ITA funds will be obligated, such as with a Purchase Order or Voucher.
- A process for documenting a three-way commitment between the individual, the service provider, and the training institution.

**General Qualifications:**

- ITAs are delivered through the One-Stop delivery system following the continuum of services from Core, to Intensive, and then Training. While no minimum timeframe or number of activities exists, individuals are expected to move from one level of service to another based upon an assessment of need for the next level of service to obtain or retain employment leading to self sufficiency.
- Individuals must receive at least one Core service before receiving Intensive services. Individuals must receive at least one Intensive service before receiving Training services.
- Individuals must have an IEP documenting his/her need for appropriate level of services, including employment goals and the appropriate combination of services for the participant to achieve those goals.

**Criteria for Individuals:**

Individuals participating in ITAs must the following criteria:

- Meet WIA eligibility requirements for Training services.
- Be determined to be in need of training.
- Have the skills and qualifications to successfully participate in the selected training program.
- Be unable to obtain sufficient grant assistance for training, such as through Pell Grants.

**Criteria for Training Programs:**

- Training will be limited to skills relevant to demand occupations as described above and/or employment opportunities in the local area or in another in which the individual is willing and able to relocate.
- Training services may be approved for occupations the local board has determined are in sectors of the economy that have a high potential for sustained growth and/or where documentation indicates employment prospects in the local area.
- All training programs funded through ITAs must be from vendors on the approved Eligible Training Providers List.

**Criteria for Training Providers:**

- Must apply to Workforce Training and Education Coordinating Board, be approved, and be placed on state Eligible Training Providers List. These lists contain quality consumer information, including cost, and performance information for each of the providers' programs, so that participants can make informed choices.
- Existing ITAs will be honored for participants already enrolled in programs where the provider falls off the Eligible Training Providers List. However, those ITAs will not be extended or modified from the existing plan.

ITAs are funded with WIA Title 1-B Adult and Dislocated Worker funds and are not allowed to be funded by WIA Youth Program funds.

**REFERENCE:**

- WIA Section 134 (d) (4) (G)
- 20 CFR 663
- Washington State Policy #3655: Individual Training Accounts
- Spokane Area Workforce Development Council One-Stop Assessments Policy #WS804
- Spokane Area Workforce Development Council On-the-Job Training Policy #W410
- Spokane Area Workforce Development Council Individual Employment Plan Policy #W412
- Workforce Investment ACT; Final Rules 20 CFR Part 652 et al.
- Workforce Investment ACT