



**INDIVIDUAL TRAINING ACCOUNTS
FOR WIOA OUT OF SCHOOL YOUTH**

Workforce Innovation and Opportunity Act Policies and Procedures
POLICY #W417

Effective Date: July, 2017

1. Purpose

This policy addresses the use of Individual Training Accounts (ITAs) for WIOA Out of School Youth when providing occupational skills or entrepreneurial training program elements with Workforce Innovation and Opportunity Act (WIOA) Title I funding. ITAs are not allowed for WIOA In-School Youth.

2. Background

WIOA provides program guidelines for providing training services for out of school youth through ITAs. Using ITA funds, eligible youth purchase training services from training providers they select in consultation with a career specialist. Individuals are expected to make self-informed choices utilizing information that is provided through skills assessment, labor market information, and training vendor performance when managing their use of an ITA.

3. Definitions

- **Brokering agency:** an entity designated by the Spokane Area Workforce Development Council (SAWDC) to be responsible for authorizing ITA awards and provide ITA payments.
- **Individual Training Account (ITA):** a payment agreement established on behalf of an individual with a training provider for the provision of a training program.
- **Recognized Postsecondary Credential:** a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or the Federal Government, or an associate or baccalaureate degree. The DOL-sponsored CareerOneStop.org provides a search tool for finding recognized postsecondary credentials at:
<https://www.careeronestop.org/toolkit/training/find-certifications.aspx>.
- **Service provider:** a provider of workforce development services in Spokane County designated by the SAWDC to determine eligibility, maintain documentation, provide career planning, and refer to appropriate training institutions to deliver training programs.
- **Training program:** a training program, also known as program of training services, is one or more courses or classes, or a structured regimen, which leads to at least one of the following:
 - An industry-recognized certificate or certification;
 - A certificate of completion of a registered apprenticeship;
 - A license recognized by the State involved or the Federal government; or
 - An associate or baccalaureate degree;
 - A secondary school diploma or its equivalent;
 - Employment;
 - Measureable skill gains toward one of the outcomes listed above.
- **Training provider:** an institution of higher education, an organization that carries out a registered apprenticeship program, or other public or private providers of training programs.
- **WorkSource Integrated Technology (WIT):** A management information system (MIS) that workforce development organizations in Washington State use to collect data and manage themselves efficiently and effectively.

4. Policy

Providing classroom-based training services to individuals through an ITA must meet each of the criteria listed below:

- a. **Types of training services that may be funded through ITAs** – Training services that can be funded through an ITA come in a variety of forms and may be delivered in a physical classroom, virtual classroom, or a combination of both. Training services that may be funded through an ITA, as relate to this policy, are defined as follows:
 - i. **Entrepreneurial training (Program Element 12):** Courses designed specifically to assist an individual in developing a business plan, learn what it takes to operate a business, perform market research, understand business models, and learn other entrepreneurial-related skills.
 - ii. **Occupational skills training (Program Element 4):** Includes general occupational training, pre-apprenticeship training, and the classroom-portion of registered apprenticeship training.
- b. **Consumer Choice Requirements** – Training services must be marketed in a manner that maximizes both regional labor market information and informed consumer choice in selecting an eligible training program to deliver the services. To ensure individuals receive this information, service providers must make available the Washington State list of eligible training providers (ETPL) and Washington State labor market information or the ETPL and labor market information of another state in which the individual is willing to commute or relocate.
- c. **Eligibility to Receive WIOA Title I Training Services** – ITAs, which are used to fund training services, may only be provided to an individual who is determined eligible as an out of school youth. Individuals must also be determined to be in need of training services through an objective assessment. Refer to SAWDC Policy W401 R2, Attachment A – Eligibility Policy Handbook, for more information on determining eligibility and completing an objective assessment.
- d. **Eligibility to Receive an Individual Training Account** – An ITA is a payment agreement established between a service provider and a training provider on behalf of an individual seeking training services. This agreement details the training program to be provided, which is selected from State-eligible training providers in consultation with WorkSource system staff. Below are specific requirements that must be met in order for an individual to receive an ITA:
 - i. **Eligible Training Provider List (ETPL):** Each state maintains a list of training providers who provide training programs eligible to receive funds provided through an ITA, known as an ETPL. An individual must select a training program from this list to receive an ITA.
 1. When a training program is removed from a state's ETPL while individuals are still participating in that program, individuals are allowed to complete their training as identified in their ITA at the time the program is removed. ITAs cannot be modified or extended (see ITA modifications below) for individuals beyond the current plan as it relates to a training program that is no longer on the ETPL in question.
 - ii. **Postsecondary credential:** When determining if an ITA can be used to pay for the training, the training program must lead to a recognized postsecondary credential.
 - iii. **In-demand priority:** When determining if an ITA can be used to pay for the training, the training program must be aligned with in-demand industry sectors or occupations in the local area or in an area the individual is willing to commute or relocate. Training programs that are not aligned with in-demand industry sectors or occupations may be considered with written permission from the SAWDC after an analysis of how the individual will obtain employment in a non-demand industry sector or occupation.
 - iv. **Training start date and duration:** Training programs must be expected to start training within 60 days of the establishment of an ITA, and training programs must have an expected completion date within 2½ years of the training's start date. Exceptions to these limits may be considered on a case-by-case basis by the service provider.
- e. **Coordination of WIOA training funds and other grant assistance** – ITA funding for classroom training is limited to participants who require assistance beyond that available under grant assistance from other sources to pay the costs of such training. The following criteria must be considered when funding an ITA:
 - i. Service providers must coordinate and make funding arrangements for all training funds an individual is eligible for within the Next Generation Zone, the WorkSource Spokane one-stop center, one-stop partners, and other entities with available funding. Examples of other sources of funding include, but are not limited to: Temporary Assistance for Needy Families (TANF), State-funded training funds such as Worker Retraining or Trade Act, and Federal Pell Grants.

- ii. A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the one-stop center 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 the one-stop center 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.
- iii. Department of Veterans Affairs benefits for education and training services are not included in the category of “other sources of training grants” and are not required to be coordinated with other available funding.
- iv. Student loans, or loans of any kind, are not included in the category of “other sources of training grants” and are not required to be coordinated with other available funding.

f. Limits to ITA funding amounts –

- i. The total amount of funding allowable through an ITA must be based on the full cost of training. The full cost of training may include any of the following costs: tuition, books, software, academic fees, educational testing and certification, and equipment and tools required by the training program. Prerequisite training may also be included as long as it is required by the educational institution to participate in the training program. Fines and penalties, such as late finance charges and interest payments, are not allowed.
- ii. After considering funds from other sources, ITA funding may not exceed what is determined as the overall cost of training.
- iii. The SAWDC has established a maximum funding amount allowable for the classroom portion of the ITA at \$5,000. Note that this is a limit on ITA training funds only. Supportive services, work-based learning (such as an OJT), and other services used to supplement an ITA are not included in this limit.

g. ITA awards and training payments – After an individual chooses an approved training program and eligibility to receive the ITA has been determined, authorization and obligation of the ITA is to be completed. This is known as an ITA award. ITA awards and training payments against the ITA award are provided as follows:

- i. The SAWDC has chosen to contract all ITA awards and funding payments through a brokering agency, identified as Career Path Services. This brokering agency is responsible for authorizing and obligating all ITA awards. The brokering agency may not deny an ITA award or payment to an individual who has been determined eligible for an ITA by an authorized service provider unless funding is limited.
- ii. Payments by this agency for training services funded through ITAs may be made in a variety of ways, including electronic funds transfer, vouchers, or other appropriate methods.
- iii. ITA training payments may be used to pay for an entire training program at the beginning of the training or on an incremental basis.
- iv. ITA training payments can be used to pay for any costs identified in the overall cost of training.

h. ITA modifications – There are times when it is necessary to modify an ITA under certain circumstances. There are no limits to when an ITA may be modified or how often. An ITA should be modified when the original scope of the training, such as length of time, course requirements, or overall cost, has changed. An ITA should not be modified if the individual’s employment goal changes or if a different training provider or program is needed. These situations may impact the requirements of the ITA so a new ITA should be written.

i. Satisfactory progress – Individuals must demonstrate satisfactory progress in their training program to receive continued funding for their ITA, except when good cause is established (defined below). The minimum amount of time an individual needs to participate to demonstrate satisfactory progress and the frequency at which this is repeated should be based on the length of the training program in question and circumstances of the individual. If an individual does not demonstrate satisfactory progress and tuition and other initial costs are paid in full at the beginning of the training, the individual is not allowed to receive any remaining supportive services tied to the ITA and the ITA cannot be modified to include additional expenses of any kind.

i. Satisfactory progress is defined as:

- 1. The individual has a grade point average that does not fall below 2.0;
- 2. The individual maintains a grade point average sufficient to graduate or receive a certificate or license;
- 3. The individual is completing sufficient credit hours to finish the training program; or

4. In cases where the training program is self-paced or ungraded, “satisfactory progress” is defined as participating in classes and passing certification examinations within a time frame established and documented in the individual’s file.
- ii. **Good cause** is defined as:
1. Illness, injury, or disability of the individual or a member of the individual’s immediate family;
 2. Severe weather conditions or natural disaster precluding safe travel;
 3. Destruction of the individual’s school records due to a disaster or other catastrophe not caused by the individual;
 4. Acting on advice received from an authority such as the training provider, the instructor, or an authorized career planner;
 5. Training is canceled or delayed;
 6. Accepting stop-gap employment with hours or other work conditions that conflict with the training; or
 7. Accepting goal-related employment prior to completion of the training.

5. **Documentation and Data Entry Requirements**

- a. **Full WIOA registration** – Full WIOA eligibility determination and registration is required to receive any WIOA-funded training service. If an individual is determined eligible for one or more Title I programs, all relevant registration elements must be collected and entered into WIT. Additionally, any relevant documentation must be collected and stored physically or electronically in the individual’s file including the assessment used to determine a need for training services. Refer to SAWDC Policy W401 R2, Attachment A – Eligibility Policy Handbook, for more information on documenting eligibility and the need for training services.
- b. **Training agreement** – A training agreement satisfying the documentation requirements of the ITA must contain the following and be stored physically or electronically in the individual’s file:
 - i. The type of training service being funded;
 - ii. The training provider and training program;
 - iii. A copy of the ETPL establishing that the training program is eligible to receive funds provided through an ITA and that it leads to a recognized postsecondary credential;
 1. If written permission has been given by the SAWDC to fund training that does not lead to a recognized postsecondary credential, this authorization as well as the analysis of how the individual will obtain employment without a recognized postsecondary credential must be included with the training agreement;
 - iv. LMI demonstrating priority consideration for in-demand industry sectors or occupations in the local area;
 1. If written permission has been given by the SAWDC to fund training that is not in an in-demand industry sector or occupation, this authorization as well as the analysis of how the individual will obtain employment in an industry or occupation that is not in demand must be included with the training agreement;
 - v. The overall cost of the training;
 - vi. The amount obligated for the ITA using Title I funding and what expenditures will be covered by the ITA; If funding comes from more than one Title I program, such as WIOA Out of School Youth and WIOA Adult, each program and the funding provided should be identified separately.
 - vii. The estimated amount of other sources of funding used to support the ITA, such as TANF or Pell Grants; and
 - viii. The start date and estimated duration of the training program.
- c. **Training progress and completion** – information showing the progress of the training and the outcome of the training once completed must be documented physically or electronically in the participant’s file as follows:
 - i. ITA payments made;
 - ii. Documentation demonstrating satisfactory progress;
 - iii. Any ITA modifications, if applicable; and
 - iv. Once the training program has completed, documentation demonstrating the end date of the training and the outcome.

- d. **Service requirements** – information regarding the training service used must be entered into WIT as follows:
- i. An appropriate qualifying service must be entered into WIT to represent the training (see Appendix A below). If funding is being provided by more than one Title I funding source, a service must be entered for each funding source as appropriate.
 - ii. This service (or services) must document the start and estimated end date of the training as appropriate in WIT. For a training program that has begun prior to enrollment in a program, the enrollment date of the respective program is used in place of the training start date. When the overall training program ends and a credential is obtained (if applicable), this is to be used as the end date of this service (or services).
 - iii. Case notes must be entered detailing the start of the training, progress during training, and the outcome of the training.

6. **Action Required**

Agencies responsible for managing classroom training services, either as a brokering agency, a service provider, or both, are defined by contract with the SAWDC. Minimum requirements for these agencies are below:

- a. **Brokering Agencies:** brokering agencies, as identified in the local plan, are required to:
- i. Maintain policies and procedures for the authorization and obligation of ITA awards and ITA payments;
 - ii. Develop a method or methods with which ITA payments will be made, such as through electronic funds transfer or a voucher system; and
 - iii. Coordinate ITA modifications and deobligations with service providers.
- b. **Service Providers:** service providers who determine eligibility for training services and ITAs, and refer to a brokering agency, as identified in the local plan, are required to:
- i. Maintain policies and procedures for determining training services eligibility and how the eligibility and requirements for ITAs will be documented;
 - ii. Develop guidelines for WorkSource Specialists (career planners) to monitor progress in a training program. At a minimum, progress must be documented quarterly to ensure satisfactory progression (defined above) or if necessary, to deobligate an ITA award if the individual has left the training program prior to completion;
 - iii. Coordinate ITA modifications and deobligations with brokering agencies; and
 - iv. Track all ITA expenditures in each individual's physical or electronic file.

7. **References**

- SAWDC WIOA Policy W409, R2
- WIN 0084
- ESD WIOA Policy 5601, R2
- 20 CFR 680.200; 680.320
- 20 CFR 680.300 – 680.520
- 20 CFR 680.600 – 680.650
- 20 CFR 681.550
- TEGL 3-15
- WIOA Section 129(c)(2)(D) and 129(c)(2)(G)

Appendix A

ITA Services Crosswalk

Based on service definitions in the WIT Services Catalog, services should be entered as follows:

ITA-Funded Training Services

WIOA Service Name	WIT Service Name(s)
• Entrepreneurial Training	• Entrepreneurial Training
• Occupational Skills Training	• Apprenticeship Training; or • Occupational Skills Training

Refer to the WIT services catalog for specific definitions of each of these services. The WIT services catalog is located at <http://www.wa.gov/esd/wit/docs/WorkSourceServicesCatalog.xlsx>.