



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

Workforce Investment Act Policies and Procedures

**POLICY #W408**

Effective Date: June 22, 2012

**PRE-VOCATIONAL TRAINING POLICY:**

Short-term pre-vocational classes are considered Intensive services which develop learning skills and are required as a knowledge and skill base before most people could either be admitted to, or progress satisfactorily in a training program which offers a degree or a certificate; or are classes that are required to enter into and progress satisfactorily in a specific occupation or career path. Examples of pre-vocational classes include, but are not limited to, those that address learning, communication, interviewing, and personal maintenance skills; punctuality; professional conduct; mathematics or language skills at the 12th grade level or lower; occupational specific mathematics and language skills, such as technical writing and precalculus even though they may be above the 12th grade level; basic computer and software application skills; occupational-specific baseline courses such as medical terminology for medical support occupations; and any class which completes a gap in baseline knowledge for a given occupation as determined by assessment against industry standards. Within the definition of pre-vocational services, the major determinant for award of pre-vocational training is a cost of less than \$750. Pre-vocational training costs are funded separately from Individual Training Accounts.

**INDIVIDUAL TRAINING ACCOUNT POLICY:**

Under the Workforce Investment Act (WIA), Title I-B training services for enrolled participants 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, among other resources. Participants receiving training under this approach will receive information they need, e.g., skills assessment, labor market conditions and trends, training vendor performance, to make an informed choices about their own employment future and the training to support their decision.

Regulations allow the state or local Workforce Development Councils (WDC) to impose limits on the dollar amount and/or duration for ITAs. [Reference: 20 CFR Part 652. 663.420 (a) and (b)].

- 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.

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.

For Spokane County, the Spokane Area Workforce Development Council (SAWDC) has established the following pre-vocational and ITA policies. The following explains eligibility for Individual Training Account expenses, the manner in which these funds are allocated, and limits on the amount of assistance available for individuals.

The ITA is a Training service, and is established on behalf of registered Adult or Dislocated Worker participants. An Individual Employment Plan (IEP) does not constitute an "obligation" of the ITA award. An ITA may be awarded based on availability of funds; a thorough individual assessment; determination by case management, as appropriate, training services are needed; and determination of skills and qualifications to successfully participate in the selected training services. The participant's IEP shall provide the justification for all services, including the appropriate combination of training and other provided services directly linked to the employment opportunities leading to economic self-sufficiency. ITAs must be linked to occupations in targeted industry clusters defined by the SAWDC and "In Demand" per the current Spokane WDA Demand/Decline Occupations list. Training in occupations that are "Balanced" requires justification and management approval at the program level. Printout of the occupation from the current list is required in the participant file upon development of the ITA. Training in occupations that are "Not in Demand" require approval by the SAWDC as well as a letter by the program petitioning the SAWDC and explaining why the occupation should be on the "Balanced" or "In Demand" list.

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. 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 necessary supportive services are available so that the training can be completed successfully.

When awarding an ITA, the case manager 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. In instances where the student has unmet needs and access of financial aid, expenses can be covered through the alternative funding sources (e.g. non-WIA grants) and those resources will be applied toward other allowable unmet need, and WIA can be applied towards tuition, books, fees, and related supplies. 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).

#### General ITA Guidelines

- The maximum limit (cap) established for ITAs is \$5,000 covering costs of training, but not supportive services. The \$5,000 is an ITA participant limit. Limited exceptions can be approved by program management given individual circumstances, conditions, and potential return on investment. Decisions are made on individual referral basis. 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.
- Generally 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 services levels. 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:

- Met eligibility requirements for training services; determined to be in need of training and to have the skills and qualifications to successfully participate in the selected training program.
- Unable to obtain other grant assistance for such training, including Federal Pell Grants; or requires assistance beyond that made available under other grant assistance programs.

#### 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 on where to use their ITAs.
- 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.

Exceptions to ITA funds:

Training services may be provided pursuant to a contract in lieu of an ITA:

- Where such training services are provided through On-the-Job-Training;
- The local board determines there are an insufficient number of eligible providers of training services in the local area involved to accomplish the purposes of a system of individual training accounts; or
- The local board determines that there is a training services program of demonstrated effectiveness offered in the local area by a community-based organization or another private organization to serve special participant populations that face multiple barriers to employment.

**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