

Workforce Innovation and Opportunity Act (WIOA) Policies and Procedures

Individual Training Account (ITA) Policy and Procedures

REVISION DATE: 01-31-2024

SUPERSEDES: ITA Policy, effective 09-15-2016

PURPOSE

This policy outlines GuilfordWorks directives for providing Individual Training Accounts (ITAs) for WIOA eligible Adults, Dislocated Workers and Out-of-School Youth (OSY) ages 16-24.

BACKGROUND

WIOA Title I training services for WIOA eligible Adults, Dislocated Workers and OSY ages 16-24 are provided through ITAs. WIOA outlines the requirements for an individual to access training services. Those requirements include; lack of success in finding self-sufficient employment through individualized career services; selecting training areas from a list of occupations directly linked to opportunities in Guilford County; and requiring additional assistance beyond available grant resources to pay for training

POLICY

ITA funding is limited to participants who:

- Complete an assessment that:
 - Identifies a need for training that leads to self-sufficiency or wages comparable to or higher than wages from previous employment, and
 - Demonstrates the participant has the skills and qualifications to successfully complete the training program.
- Complete an Individual Employment Plan (IEP) that identifies the designated training program with anticipated start and end dates.
- Are unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals.
- Select training programs that are:
 - Included on the Eligible Training Provider List, and
 - Directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area; and
- Maintain satisfactory progress/grades throughout the training program.
- Agrees to communicate with the workforce staff at least monthly.

The above documentation must be placed in the participant's record.

A. Coordination of WIOA Training Funds and Other Federal Assistance

WIOA Service Providers must consider the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the cost of their training or require assistance beyond that available under grant assistance from other sources to pay the costs of such training. In making the determination, WIOA Service Providers may take into account the full cost of participating in training services, including the cost of supportive services and other appropriate costs.

Additional grant assistance may be available through sources such as but not limited to: Temporary Assistance for Needy Families (TANF)-WorkFirst; Title IV Programs such as Federal Pell Grants, Academic Competitiveness Grants, Federal Supplemental Educational Opportunity Grants, or Federal Work-Study; and state-funded grants.

WIOA Section 134(c)(3)(B)(ii) states that training services may be provided under this paragraph to an individual who otherwise meets the requirements of this paragraph while an application for a Federal Pell Grant is pending, except that if such individual is subsequently awarded a Federal Pell Grant, appropriate reimbursement shall be made to the entity which provided payment from such Federal Pell Grant.

Service Providers must consider and document in the participant file the availability of other sources of grants, **excluding loans**, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. The use of WIOA funds to make payments towards a personal loan of an otherwise eligible participant is prohibited. However, the mere existence of a federal loan, **regardless of the status**, must not impact ITA eligibility determinations.

Service Providers must document the availability and coordination of other training funds in the participant record.

B. ITA Authorization

ITAs must be approved by a WIOA Service Provider authorized representative prior to issuance. ITA authorization must be documented in the participant record.

ITAs are authorized only for training programs listed on the Eligible Training Provider List (ETPL). ITA funds are paid directly to the training provider using the Service Provider's fiscal system.

ITAs may be used for pre-apprenticeship programs however, only pre-apprenticeship programs listed on the ETPL may be approved.

ITAs may be authorized for training programs in other local areas or online training if the training program is listed on that State's ETPL.

C. Funding Mechanisms other than ITAs

Mechanisms other than ITAs may be used to provide training services that do not rise to the level of occupational skills training, including individualized services such as workforce preparation activities or short-term prevocational services. Individualized services may include literacy, internship, work experience and other training activities that may not provide formal occupational skills training or be appropriate for an ITA.

Similarly, short-term prevocational services are designed to prepare a participant for work but do not provide formal occupational skills training. As such, ITAs are not authorized for individualized short-term prevocational training. Short-term prevocational training may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct, or other non-occupation-specific topics that are intended to prepare individuals for unsubsidized employment or training.

D. ITA Funding Limit

The ITA funding limit is **\$10,000** for the program.

The \$10,000 is intended to cover multiple stackable credentials to allow for a career pathways model. If an individual has received ITA funding for a demand industry it is not allowable without Executive Director approval to switch career paths.

The maximum ITA limit is not an entitlement. The amount and duration of each participant's ITA award is determined on an individual basis. Funding amounts will take into account the total costs of the selected training program, any other financial assistance available to the participant, and the WIOA funding available to the Adult, Dislocated Worker or OSY Programs. Participants may select training programs that cost more than the maximum authorized

limit when other sources of funds such as Pell Grants, scholarships, severance pay or other resources are available to supplement the ITA.

The ITA funding can only include the cost of training services such as instructor salaries and benefits, classroom space, instructional materials, academic fees, educational testing and certification, tuition, books, individual materials, supplies, tools, and equipment.

An ITA may fund prerequisite training to a vocational training program if it is required by the educational institution.

E. ITA Continued Funding, Satisfactory Progress

Continued funding of an ITA is contingent on availability of WIOA funds and on the participant's satisfactory progress in school, except for good cause. Service Providers must review the participant's training progress and expenses quarterly or more frequently depending on the training institution's schedule. A participant's training progress will be considered satisfactory upon earning:

- A grade point average that does not fall below 2.0 for two consecutive terms, or
- A grade point average sufficient to graduate from, or receive certification in, the individual's approved area of study, or
- Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.
- In the case of self-paced or ungraded learning programs, satisfactory progress means participating in classes and passing certification examinations within the timeframe established under the approved training plan.

Service Providers must arrange to receive training progress reports (i.e. transcripts) from participants in adequate time to process the subsequent tuition payment. Progress reports, transcripts or other training-issued updates must be documented in the participant record.

Service Providers, in collaboration with participants, must develop a service strategy to overcome barriers impacting progress for participants who are not earning satisfactory progress in their coursework. WIOA ITA funding may be terminated if participants do not earn satisfactory progress for two (2) or more consecutive school terms (i.e. quarters, semesters, etc.).

Good Cause - "Good cause" for failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress. Good cause includes, but is not limited to:

- Illness, injury or disability of the participant or a member of the participant's immediate family,
- Severe weather conditions or natural disaster precluding safe travel,
- Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant,
- Acting on advice received from an authority such as the training provider, instructor, or case manager,
- Training is delayed or cancelled,
- Accepting stop-gap employment with hours or other work conditions that conflict with the training, or
- Accepting goal-related employment prior to completion of training.

F. ITA Modifications

An ITA may be modified to ensure the participant attains their educational goals and subsequent employment. In some circumstances, such as when a program of training is removed from the ETPL, or when extraordinary program expenses develop, the participant and career planner must agree on whether to complete the plan of training with the existing provider, seek a similar program, or discontinue training.

When a program of training 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 plan approval as it relates to a program of training that is no longer on the ETPL.

Service Providers must use discretion in determining the amount of ITA modifications to authorize. Any modifications to the ITA must be documented in case notes in ETO.

G. Documentation Requirements

The following must be included in the participant record and documented in case notes in NCWorks:

1. Documented assessment results that justify the need for training and includes evidence:
 - The participant has the skills and qualifications necessary to successfully complete the training program, and
 - The participant is unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone.
2. Evidence the selected program of study will result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.
3. Evidence the selected training program is directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area or in the planning region or in another area in which the participant is willing to travel or relocate.
 - If applicable, documentation of the participant's willingness and ability to travel to locations outside of Guilford County if the selected training program is outside of Guilford County must be documented in case notes and on the IEP.
4. Completed IEP (Adult and Dislocated Worker) or ISS (OSY ages 16-24) documenting the selected program of study, anticipated and actual start/end dates and training outcomes.
5. Evidence the participant is unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals.
6. Verification of FAFSA or other financial award status, if applicable.
7. Evidence the selected training program is on the Eligible Training Provider List (ETPL).
8. Authorization of the ITA and any approved increase or modification.
9. Copies of transcripts, grades, progress reports or other documentation providing evidence of the participant's satisfactory progress in training.
10. Training outcome. This includes:
 - If applicable, reason for the participant's discontinuation of training and the change in service delivery as a result of this decision.
 - Copy of degree, certificate or other evidence of satisfactory completion of training

REVISION APPROVED

Danielle A. Harrison

03-07-2024

Date

EQUAL OPPORTUNITY – EQUAL ACCESS

GuilfordWorks is an equal opportunity employer and provider of employment and training services.
Free auxiliary aids and services are available upon request for individuals with disabilities.