

Technical Assistance Guidance

TAG 48-2021

Issued Date: February 18, 2021

Subject: Policy Revisions – GEN-050-08, Individual Training Accounts

Purpose

This TAG provides guidance regarding revisions to WC Policy GEN-050-08, Individual Training Accounts (ITAs).

References

29 U.S.C. § 3174 (c)(3); Public Law (P.L.) 113-128 WIOA Secs. 134, 129, 171, 116, 503; 20 CFR Part 680; 20 CFR Part 681; 20 CFR Part 683; TEGL 13-15; TEGL 19-16; TEGL 21-16; State Compliance Policy (SCP) 1.8, 1.10, 1.11, and 2.2

Background

WIOA was signed into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973.

WIOA supports a more integrated, effective, job-driven workforce investment system that builds on proven practices such as sector strategies, career pathways, regional economic approaches, and work-based training. WIOA provides for a workforce system that is universally accessible, customer centered, and training that is job driven.

ITAs are a key tool used in the delivery of training services within the workforce development system. An ITA is used to assist an individual to access training services from an approved provider of training services on the State's Eligible Training Provider List (ETPL).

Guidance

With the commitment to improve processes, and after further research and assessment of previous requirements, WC has revised the above-mentioned policy to reflect the following revisions:

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Individuals who have previously started a training program prior to enrollment into WIOA Title I

1. Individuals who may have already started a training program prior to enrolling in WIOA Title I services may be assisted with trainings costs on a case-by-case basis. Exceptions may be granted by Workforce Connections staff to individuals who have suddenly become dislocated from employment or their financial situation has substantially changed since they started the training program.
2. The individual must provide documentation from the Eligible Training Provider that they are currently, or were prior to discontinuing the training program, in good standing in the training program and have documented satisfactory progress and attendance. All attendance and progress records must be received by the WIOA Title I service provider for review.

3. Workforce Connections' service providers can only pay for the portion of training costs not completed prior to the individual enrolling in WIOA services subject to the following:
 - a) The amount of training costs to the WIOA Title I service provider must be pro-rated based on the number of hours already completed by the individual;
 - b) The individual must provide documentation verifying financial responsibility for any unpaid costs for the training prior to the WIOA enrollment; and
 - c) Any costs not eligible for payment with WIOA Title I funds must be shared by the participant and the training provider equally.

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Source Documentation Requirements

Contact between the career coach, counselor, or career specialist and the program participant must occur regularly during the lifetime of the training course. Contact may be made by telephone, through the mail, in-person contact, e-mail, SARA, or other appropriate means to obtain supporting documentation of successful progress.

The career coach must maintain a minimum of monthly contact to ensure that the participant is making adequate progress during the training program and this must be documented in case note entries in the MIS (currently EmployNV).

The following documentation must be maintained in the participants' file:

Training
<ul style="list-style-type: none"> ▪ Properly completed ITA form, which can be found at www.nvworkforceconnections.org ▪ Properly completed IEP/ISS ▪ Print-out from the ETPL list to demonstrate that the training provider and training program was active at the time when training was approved ▪ Documentation that the WIOA Title I service provider attempted to leverage financial assistance from other non-WIOA Title I sources ▪ Documentation that the participant has been determined in need of training and has the necessary skills and qualifications to successfully complete the training program ▪ Copy of comprehensive assessment(s) e.g., WorkKeys, Basic Skills Testing, Structured Interview, etc. ▪ Copy of attendance records and progress reports on a monthly basis ▪ Copy of invoices from training provider ▪ Copy of credential, diploma or certificate ▪ Copy of payment to training provider ▪ Documentation to validate measurable skills gain
Proof of Demand Occupation. The participant's file must include at least one.
<ul style="list-style-type: none"> ▪ Proof the occupation is on Workforce Connections' Demand Occupation List. ▪ Five (5) job postings

- Intent to hire letter from employer
- Other demand occupation list as approved by Workforce Connections

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Duration, Cost Limits and Availability

Consistent with 20 CFR §680.310 Workforce Connections may impose limits on ITAs, such as limitations on the dollar amount and/or duration.

- A. In order to provide opportunities for as many adults, dislocated workers, and youth as possible, Workforce Connections has implemented the following limits on WIOA Title I funding and length of training during the individual's participation period in WIOA Title I services.
1. The total WIOA Title I funding cap per individual for an ITA/ITAs is \$8,000.00.
 2. The length of time an individual can attend training shall not exceed two (2) years.
- B. Workforce Connections has established the following limits based on training program structure:
1. Non-semester-based programs – the total WIOA Title I costs on the ITA cannot exceed \$8,000.00 for a training program not to exceed a 24-month period.
 2. Semester-based programs – the total WIOA Title I costs on the ITA cannot exceed \$2,000.00 per semester and up to \$4,000.00 per year for a one-year diploma/certificate program to include the fall, spring, and summer semesters. For a two-year semester-based curriculum program, the amount cannot exceed \$8,000.00 for the two-year period.
- C. **Exceptions:** If program participant's referral to other community providers fails, exceptions to the established cap amount may be requested. Approval may be granted by Workforce Connections based on an individual case review.
- D. The ITA shall be for an in-demand occupation on Workforce Connections' Demand Occupations List. In-demand occupations were chosen using various industry- and occupation-focused measures. These measures include: projected openings, projected growth, and historic job posting data. The list of in-demand occupations will be validated or further enhanced using business data from online job forecasts.
- E. Workforce Connections may limit the number of trainings for a particular occupation to 10% of the total annual job openings as projected on the Short-Term Occupational Projections for the corresponding County in the SNWDA.
- F. Continued funding of an ITA is contingent on availability of WIOA Title I funding and the participant's progress in the training program. Career coaches will review the participant's training progress on not less than a monthly basis. A participant's progress will be considered satisfactory upon earning:
1. A grade point average that does not fall below 2.0 for two consecutive semesters; or
 2. A grade point average sufficient to graduate from, or receive certification in, the participant's approved area of study; or
 3. Sufficient credit hours to finish the approved course of study within the timeframe established under the ITA; or
 4. 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 IEP/ISS.

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Payment

- C. Workforce Connections will pay 50% at the beginning of the training and the remaining 50% when the participant has completed at least 60% of the training program. For training providers choosing to invoice only once, they shall submit an invoice for 100% at the 60% completion mark.

- D. The provider of training services shall neither, charge students, nor invoice Workforce Connections for costs other than those stated in EmployNV.

Technical Assistance

Available upon request.