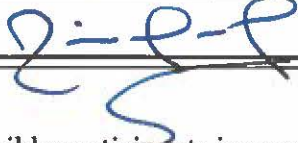


Workforce Connections General Policies Individual Training Accounts (ITAs)	<h1>GEN-050-08</h1>
	Revision No.6 – Effective 7/1/2024
Policy Approved By: WC Executive Director Policy Adopted on: 8/1/2023	

Purpose

To establish further guidance on the provision of ITAs for eligible participants in programs funded in whole or in part by Title I of the Workforce Innovation and Opportunity Act (WIOA).

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 establishes 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. Also, WIOA supports and strengthens a workforce system that is universally accessible, customer-centered, and training that is job-driven.

Individual Training Accounts (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 in accessing training services from an approved provider of training services on the State’s Eligible Training Provider List (ETPL).

Policy

ITA services may be made available to employed and unemployed individuals who have met the eligibility requirements for career and training services and have been determined to be unable to obtain or retain employment leading to self-sufficiency through such services. Sub-recipients must give priority consideration to training programs that lead to recognized post-secondary credentials that are aligned with in-demand industry sectors or occupations in the Southern Nevada Workforce Development Area (SNWDA). Training programs must be directly linked to in-demand occupations.

References

29 U.S.C §3174(c)(3); P.L. 113-128 WIOA Secs. 134,129,171,116,503; 20 CFR Parts 680, 681, and 683; 2 CFR Part 200; TEGL 19-16; TEGL 21-16; SCPs 1.8, 1.10, 1.11, 2.2, 3.12; Workforce Connections – GEN-050-06.

Regulations codified at 20 CFR §680.420 further describe a program of training services as one or more courses or classes, or a structured regime that leads to:

- A recognized post-secondary credential, secondary school diploma, or its equivalent,
- Employment, or
- Measurable skills gain toward such a credential or employment.

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I. General Provisions for Individual Training Accounts (ITAs).

An ITA is one of the key methods through which training services are financed and provided to WIOA Title I eligible program participants. An ITA may be established on behalf of a WIOA-eligible program participant to purchase training services from eligible training providers in consultation with a career coach or a job developer. Workforce Connections has established that ITAs may be established only if the following conditions are met:

- A.** Program participants have met the eligibility requirements for WIOA individualized career services and are unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through such services.
- B.** The program participant needs training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, see Workforce Connections policy GEN-050-09.
- C.** The program participant has received, at a minimum: (a) a comprehensive/specialized assessment of skills levels and service needs; (b) career coaching services and career planning; (c) a completed Individual Employment Plan (IEP)/Individual Service Strategy (ISS); and (d) individualized employment counseling.
- D.** The program participant has the skills and qualifications to participate successfully in training services.
- E.** Have been determined eligible to receive training services at any of the approved training providers listed on the ETPL. The ETPL offers detailed information regarding training cost and duration, as well as available locations and contact information.
- F.** Participants wishing to receive training services must first meet with a career coach to discuss/evaluate the need for training services and that the requested service is necessary, reasonable, and allowable.
- G.** Prior to the approval of an ITA, the program participant must have a properly completed IEP and/or ISS that indicates through interview, evaluation, and assessment that the participant has been determined to be in need of training services and has the necessary skills and qualifications to successfully complete the selected training program.
- H.** The determination of the need and reasonability of training activity must first be documented via assessment of skills using the IEP and/or the ISS.
- I.** The Program participant received career services but was unable to secure employment that leads to self-sufficiency, and such services have been properly documented and recorded in the program participant's file and the authorized Management Information System (MIS).
- J.** Program participant has been unable to secure other financial assistance to cover the cost of the training program, including Pell Grants, and pertinent information has been properly documented and recorded in the MIS.

- K.** It has been demonstrated, recorded, and documented that the selected training program leads to the attainment of a recognized post-secondary credential and/or certificate and is aligned with in-demand industry sectors or occupations in the local area.
- L.** The training program must be outcome-oriented and focused on the participant's occupational goals as specified in the program participant's IEP or ISS.
- M.** It has been demonstrated, recorded, and documented that the selected training program is directly linked to a demand occupation in the local area or in another area, to which the participant is willing to relocate.
- N.** In the event a program participant is required by an employer to secure and/or obtain another certification, a letter from the employer must be obtained to demonstrate and document such need.
- O.** ITAs for Youth. When using youth funds for ITAs, the ETPL must be used.
1. ITAs **are only allowed for Out-of-School youth ages 16-24** under the Title I youth program. The school status is determined at the time of enrollment in the WIOA Title I program and does not change throughout the participation period. Occupational skill training activities must be clearly addressed in the participant's ISS.
 2. ITAs **are not allowed** for In-School youth under the youth Title I program. An ISY participant may access an ITA through co-enrollment in the WIOA Title I Adult program provided the participant is eligible for the adult program.
- P.** 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 training 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 whose 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 prorated 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.

Q. Provision of Training for Employed Individuals

Consistent with section 134(c)(3)(A) of WIOA and its associated regulations codified at 20 CFR §680.210, training services may be provided to an eligible employed individual when the employee is not earning a self-sufficient wage or wages comparable to, or higher than, wages from previous employment. Proper documentation must be retained to establish wages at the time of training. If the participant is earning a self-sufficient wage, or wages comparable to, or higher than, wages from previous employment, then proper justification must be retained to validate that the participant is unlikely to retain self-sufficient employment.

R. Dual Enrollment

1. Sub-recipients shall coordinate funding between separate WIOA Title I grants, as long as the individual is not enrolled in two programs of service under the same funding stream. Dual enrollment must be justified as being due to fiscal management requirements, and not solely to augment client enrollment numbers.
2. Dual enrollment shall not take place without the prior written approval of Workforce Connections. In order to provide funding for training that cannot be fully funded under the dislocated worker program; a service provider may coordinate with funds from the adult worker program provided that the program participant is eligible for both programs. A program participant cannot be enrolled in two (2) dislocated worker programs with two (2) different service providers.

II. 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 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 kept in the participants' file:

Training – Acceptable Documentation

- Properly completed ITA form, which can be found on the Workforce Connections' website.
- Properly completed IEP or ISS.
- A printout from the ETPL showing the selected training provider and training program were active at the time the training service was approved.
- Documentation in support of efforts taken to secure or leverage financial assistance from other non-WIOA sources.
- Documentation to demonstrate that the program participant has been determined to need training services and has the necessary skills and qualifications to successfully complete the selected/approved training program.
- Copy of comprehensive assessment(s), e.g., WorkKeys, Basic Skills Testing, Structured Interview, etc.
- Copy of attendance records and progress reports, monthly.
- Copy of invoices from the training provider.
- Copy of credential, diploma, or certificate.
- Copy of payments made to the training provider.
- Documentation to validate a measurable skills gain.

Proof of Demand Occupation. The program participant file must contain at least one of the following:

- Proof that the occupation is on the Workforce Connections' Demand Occupation List,
- Five job postings,
- Intent to hire letter from an employer, and
- Other demand occupations list as approved by Workforce Connections.

III. Coordination of Funds and Services

ITAs are not entitlements and may be made available to eligible program participants who after an interview, evaluation, assessment, or career planning have been determined to:

- A. Either be unable to obtain grant assistance from other sources (including Federal Pell and other Federal grants) to pay the cost of their training; **or**
- B. Require assistance beyond the assistance made available under other grant assistance programs, including Federal Pell grants.
- C. Additionally, the sub-recipient must coordinate funds available and make funding arrangements with partner agencies so that WIOA Title I funds supplement the Pell Grant and other sources to pay for the cost of training. Coordination of funds must be completed prior to an ITA being initiated.
- D. It is allowable for a WIOA Title I program participant to enroll in a WIOA-funded training activity while their Pell Grant application is pending provided that the sub-recipient has made prior arrangements with the training provider and the program participant regarding the proper and timely allocation of the Pell Grant if it is subsequently awarded. It is the policy of Workforce Connections that if a Pell Grant is awarded, the training provider must reimburse Workforce Connections the ITA funds used to underwrite the portion of the training cost from the Pell Grant.
- E. Sub-recipient must consider all available sources of funds in the local area and make necessary arrangements to leverage WIOA Title I funds with community organizations at large.
 1. State of Nevada, Department of Human Resources, Welfare Division,
 2. Local community-based organizations,
 3. State of Nevada, Employment Security Department,
 4. Local housing programs,
 5. Local social service programs,
 6. Faith-based programs,
 7. Pell Grants,
 8. Veteran service programs, and
 9. Other Federal and State funded social service programs.
- F. Sub-recipient must document the denial of available source funds the program participant is eligible for and obtain documentation of award amounts prior to creating an ITA and obligating additional funds.

IV. 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.** To provide opportunities for as many adults, dislocated workers, and youth as possible, Workforce Connections has implemented the following limits on WIOA Title I funds 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 ITAs is \$10,000.00.
 - 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 \$10,000.00 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 \$2,500.00 per semester and up to \$5,000.00 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 \$10,000.00 for the two-year period.

- C. Exceptions:** If the program participant’s referral to other community providers fails (see item III (E)), 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 the availability of WIOA Title I funds 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.

- G.** Sub-recipients are to base the amount approved for ITAs on each eligible program participant’s needs and circumstances, as specified in the program participant’s IEP or ISS, and the availability of program funds.
- H.** Consistent with 20 CFR Part 680.310 (d), an individual may select a training program that costs more than the minimum amount available for ITAs under a State or local policy when other sources of funds are available to supplement the ITA. These other sources may include Pell Grants, scholarships, severance pay, and other sources.
- I.** An ITA may only be modified twice by a participant during the duration of training.
- J.** Any training institution interested in providing services to WIOA Title I program participants must be listed on the ETPL. WIOA Title I program participants may be only referred to training providers listed on the ETPL. The ETPL for the SNWDA is administered by the Nevada Department of Employment, Training and Rehabilitation (DETR) and can be found at <https://nvworkforceconnections.org>.

V. Additional Provisions

- A.** A comprehensive assessment, WorkKeys, must be conducted for individuals seeking ITAs. In order to support WIOA Title I program participant’s employment goals and objectives a comprehensive assessment shall identify, but is not limited to, the following:
 1. Barriers to employment (beyond skills development) which impede the program participant’s ability to search for, accept, and/or retain employment.
 2. “Employment and occupational goal(s)” relevant to the local/regional labor market.
 3. “Proficiency in the occupational knowledge, skills, and abilities” associated with the employment and objective goals.
- B.** A comprehensive assessment requires consideration of all factors that comprise a participant’s IEP or ISS including, but not limited to: a) career planning; b) having proper prerequisites; c) career readiness; d) transferable skills; e) barriers to successful participation and completion of training; f) skills gap; g) demand occupations in the local area; h) availability and leveraging of services and resources.

VI. Payment

- A.** Workforce Connections will process all payments related to occupational skills training. Sub-recipient is required to submit standardized documentation two (2) business days prior to the ITA start date to Workforce Connections in order for payments to be authorized and processed. Exception to this requirement may be granted on a case-by-case basis. All liability will remain with sub-recipients for any payments determined to be disallowed for any reason. Training payments made directly by the sub-recipient may not be reimbursed.
- B.** For the purpose of appropriate programmatic and fiscal management practices, the total training program cost must be obligated at the time the program participant is enrolled in the training program, not when an ITA is established or approved. The planning and/or approval of training activities alone do not constitute an obligation. This must be taken into consideration to ensure the most effective and efficient use of training funds.

- 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.
- E.** Recovery of Tuition Funds
Consistent with established requirements, policy GEN-050-06 Sec. IX (F)(1), in the event a program participant stops training, the case manager and/or career counselor must ensure the recovery of WIOA training funds.
The following must be verified:
1. Provider of training services refund policy in place;
 2. Refund agreement prior to training start and usually found in the ITA;
 3. Notification from the training provider and/or program participant indicating early program participant dropout;
 4. Attendance records and/or time spent in training;
 5. The percentage of the advance payment to be refunded;
 6. The timeframe for the refund.

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