


<b>Workforce Connections General Policies Individual Training Accounts (ITAs)</b>	<b>GEN-050-08</b>
	<b>Revision No. 4 – Effective 02-13-2017</b>
<b>Policy Approved By: Executive Director Policy Adopted on: August 01, 2013</b>	

**Purpose**

To establish guidelines on the provision of ITAs for eligible programs participants on programs funded under 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 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.

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 to access 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 for 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 occupations that are in demand in the SNWDA, or in another area to which an individual receiving such services is willing to relocate.

**Reference**

Public Law 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

Consistent with 20 CFR § 680.420, a program of training services is 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.

<b>Workforce Connections Policy GEN-050-08</b>	<b>Workforce Connections General Policies</b>
--	---

**I. General Provisions for Individual Training Account (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 participant have met the eligibility requirements for WIOA individualized career services and is 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 is in need of 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 services need; (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 need and reasonability of training activity must first be documented via assessment of skills using the IEP and/or the ISS.
- I.** 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.** No training cost shall be paid if an individual has started a training activity prior to enrolling in a WIOA Title I program. An exception may be granted if the training program is greater than six (6) months long and is an established career pathway system program. Exceptions must be approved by Workforce Connections.
- 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 Support Documentation/Information – Required**

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, personal contact, e-mail or other appropriate means to obtain supporting documentation of successful progress.

**Training**

- Properly completed ITA form, which can be found at [www.nvworkforceconnections.org](http://www.nvworkforceconnections.org)
- Properly completed IEP/ISS
- Print-out from the ETPL list to demonstrate approved training provider and approved course of training program was active at the time training was approved
- Record that will demonstrate that participant was unable to secure financial assistance from another local organization
- Record that will demonstrate that the participant has been determined to be in need of training and has the necessary skills and qualifications to successfully complete the selected training program
- Copy of attendance records
- Copy of invoices from training provider
- Copy of progress report
- Copy of credential/diploma or certificate
- Copy of payment

**Demand Occupation**

- 
- List of demand occupations, published by the Nevada Department of Employment, Training and Rehabilitation (DETR)  
<http://www.nevadaworkforce.com/aspdotnet/search/adSearch.aspx?quickSearch=demand%occupations>; **or**
  - Print-out from Nevada Career Information (NCIS) indicating current openings in the local area  
<https://portal.nvcis.intocareers.org/>; **or**
  - Labor market information reports providing local projections -  
<http://www.nevadaworkforce.com>; **or**
  - Intent to hire letter from employer

**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 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
  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. Currently, Workforce Connections has established a dollar amount cap for ITAs, which is not to exceed \$15,000. 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.
- B. **Exceptions:** If program participant's referral to other community providers fails (see item III (E)), exceptions to the \$15,000 dollar cost of service cap may be requested. Approval may be granted by the Workforce Connections' Executive Director based on an individual case review.
- C. 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 pays, and other sources.
- D. An ITA may only be modified twice by a participant during the duration of training.
- E. 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/?page\\_id=8914](https://nvworkforceconnections.org/?page_id=8914)

## **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.** No training cost shall be paid if an individual has started a training activity prior to enrollment in a WIOA Title I program unless prior written approval is obtained from Workforce Connections.
- D. Recovery of Tuition Funds**  
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:
- Provider of training services refund policy in place;
  - Refund agreement prior to training start and usually found in the ITA;
  - Notification from the training provider and/or program participant indicating early program participant dropout;
  - Attendance records and/or time spent in training;
  - The percentage of the advance payment to be refunded;
  - Timeframe for the refund.