

# CENTRAL ARKANSAS Workforce Development Board Proudly Serving the Counties of Faulkner, Lonoke, Monroe, Prairie, Pulaski, Saline



Policy Number: Policy 2.5	Implementation Date:	12-09-2024

## **Individual Training Account Policy**

## Purpose:

This policy provides guidance on the development and use of "Individual Training Accounts" (ITAs) for the procurement of training services for eligible WIOA adults, dislocated workers and out-of-school youth and other workforce grant participants. An ITA is an agreement established with a training provider to pay certain required costs on behalf of the participant. The ITA is written for an allowable type of program of study that is on the state eligible training provider list (ETPL) and has been approved by the Central Arkansas Workforce Development Board.

## Policy:

Funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of such training or participants who require assistance beyond that available under grant assistance from other sources to pay the cost of such training.

Individual participants are expected to utilize information that is provided (e.g., skills assessment, labor market conditions/trends and training vendor performance) to take an active role in managing their employment future through the use of Individual Training Accounts (ITAs). Upon the determination that training services are appropriate for a participant, an ITA must be utilized to procure training services from the eligible training provider list for Adults and Dislocated Workers and Out-of-School Youth. An ITA may also be used for other workforce-related grants.

#### **Customer Choice**

A participant may select any WIOA-approved education and training program in the state, as listed on the current ETPL, if they meet all other criteria relating to initial and subsequent eligibility for such educational and/or training services. Individuals seeking WIOA-funded assistance have the freedom of "customer choice" in selecting the training program that best fits their personal and career needs as determined through the ITA process. (20 CFR § 680.340)

#### **Eligible Training Providers**

Interested individuals may request and receive an Eligible Training Provider list of appropriate providers for the training desired, along with performance information concerning these providers. They may also receive information concerning limits, in general, for specific credentials and for specific programs, if any. Eligible training providers shall be selected by the participant through consultation with program staff and or employment counselors.

## Procedures for Issuing an ITA

Pre-requisites: The ITA scholarship application process requires that the participant is first provided an assessment and completes an IEP that indicates that they are in need of training based on the eligibility criteria and have the necessary skills and qualifications to successfully complete the selected training program.

#### A participant completes the following steps to apply for an ITA scholarship:

- 1. Attends one-on-one information session with program provider staff.
- Conducts research into career training programs.
- Selects a training program from the Demand Occupations Training List and the ETPL. (The ITA applicant must meet the basic eligibility criteria for the training program at the time of ITA application. Training program eligibility may include criteria such as prior education and/or skill levels, a clean driving record or no criminal record.)
- 4. Secures a copy of the course listing for the intended training program.
- Explores all available resources to pay for the cost of training to ensure an ITA is needed.
- 6. Applies to a training program with the understanding that acceptance and enrollment does not guarantee the ITA scholarship,
- 7. Applies for any financial aid that is available.
- 8. Has a representative of the training institution complete and submit the Student Accounts form or a document or another named document that establishes the Coordination of Benefits. The participant must provide proof that they have applied for FAFSA (Free Application for Federal Student Aid), if applicable.
- 9. Meets with program staff to complete required assessments.
- Occupational Skills Training Agreement must be completed and signed by the participant.

## Program staff completes the following steps to complete the ITA scholarship:

- Completes and submits the ITA scholarship application which consists of the following documents:
  - Good Standing Letter (Letter can be obtained from the training provider)
  - ITA Voucher (This voucher must be signed by the participant, the training provider, the WIOA Program Director, and the Executive Director.)
  - Demand Occupation List
  - Eligible Training Provider List
  - Cost Sheet

- WIOA Enrollment Eligibility Detail List
- 2. Results of assessment and including TABE Reading and Math Score.
- 3. Documentation that prerequisites for occupational training are met (e.g., standard prerequisite self-attestation, driving record, etc.).
- 4. Submits the application package to the program director for review for completion and decision to move forward in the approval process.
- 5. All steps in the ITA process are documented in AJL.

## ITA Approval Process

If approved by program staff, the application is submitted to the following levels of authority for review:

- Workforce Center Staff's Signature
- Workforce Center Manager's Signature
- Director of Workforce Programs' Signature
- Monitor's Signature
- Deputy Director/EEO Officer's Signature

The Executive Director will approve the ITA by signing and dating the original document and route the document to the accounting department.

## Following up on Training Progress

Once a participant starts training, the program provider staff contacts them periodically to monitor their progress and offer support. Contact may be through phone calls, texts or email. Contacts with the participant and updates on the participant's progress are documented in AJL. These steps include documenting eligibility, assessment, application process, monitoring of progress and acquired training certificates and/or credential.

## Limits on the Number if ITA's a Person May Receive

An ITA is written a semester at a time. The number of ITA's written for an individual for the same program or course of study will depend on the duration of time that is required to complete the course of study by the training institution not to exceed two (2) academic years of training. Participants will not be eligible for ITA assistance on repeat courses that were previously funded by WIOA Title I -B programs.

## Funding

All payments to the training provider will be paid through the ITA when an ITA is determined to be appropriate for the training provided. There must be coordination of funding with other entities as appropriate. WIOA funds must supplement other sources of training grants. WIOA Title I-B training funds must always be the final, not the first, resort for funding training.

As stated in WIOA Final Rules, Department of Veterans Affairs benefits for education and training services are not included in the category of "other resources of training grants" listed in 29 CFR sec. 680.230(b). Therefore, veterans and spouses are not required to first use any available benefit entitlements associated with their military service before being considered eligible for WIOA-funded training, and Service Providers are not required to consider the availability of those funds.

#### **Funding Limits**

Tuition and fees for WIOA Title I and other workforce grant funding is limited to a maximum of \$10,000 per participant. Funding amounts will take into account any other financial assistance available to the participant and also the federal funding available to the Adult, Dislocated Worker, or Out-Of-School Youth program operator. Other costs associated with training such as parking fees, school supplies, parking passes, licenses, books, uniforms, inoculations, background checks, driving abstracts, etc. may be considered a training cost and would thereby be included in the \$10,000 maximum for tuition and fees. An individual may select training that costs more than the maximum amount available for ITA's under the local policy when other sources of funds are available. (e.g. Pell Grants, scholarships, etc..)

### Exceptions

An individual's funding limit or duration of time of their ITA must be approved by the Executive Director of the Central Arkansas Planning and Development District. Funding limits may be increased to \$15,000. Such an increase may only be considered under compelling circumstances.

A participant may be able to extend an ITA (or surpass the allowed number of ITAs) if the course of study is not completed in the expected timeframe. The Workforce Center Manager is responsible for submitting a request to the Executive Director, which must completely state the reasoning for the funding or time exception request.

#### Pell Grant and Scholarships

WIOA Title I-B participant may enroll in WIOA-funded training while his or her application for a Pell Grant is pending. However, the CAWDB will maintain arrangements with the training provider and the WIOA participant, that require the training provider to reimburse the WIOA funds used to underwrite the training for the covered amount of the Pell Grant or scholarship.

## ITA Invoice Submission and Payment Process

To pay an ITA, the following steps must be taken:

- The training provider will submit an invoice along with supporting documentation itemizing specific cost (books, uniforms, tools, etc.) for payment to the WIOA program staff.
- Program staff must review the document(s) for accuracy, attach to the ITA Voucher and initial signifying their review and submit to Program Director.
- 3. Program Director review and sign for approval or if modification is needed, will return to the WIOA Staff.
- 4. Once approved, the invoice with supporting documentation will be forwarded to Accounting for processing of payment.

## Maximum Duration of an ITA

The amount and duration of an ITA award is based on the type of credential and shall be determined on an individual basis. Each ITA will be limited to two academic years of training for eligible participants to earn/complete an academic degree, technical certificate, or occupational license. An ITA may be utilized to complete a bachelor's degree for a participant with an associate degree if their occupational goal requires a bachelor's degree and/or such degree will increase their employability. An ITA may be utilized to fund prerequisite training for a vocational training program if such prerequisite is required by the educational institution.

Participants are allowed to request a modification of an ITA. Modifications are determined on an as-needed basis depending on the provided individual circumstance (e.g. gap in service due to illness, additional supplies or books needed, added academic fees, etc.).

An ITA may be modified three times. The conditions for modifications must be well documented and the new modified ITA agreement must be signed by all parties involved. There may be a limit for an individual participant that is based on the needs identified in the Individual Employment Plan, such as the participant's occupational choice or goal and the level of training needed to succeed in that goal. The agreement must be signed by the case manager, the participant, and the individual authorized to sign the ITA. A copy of the agreement must be given to the participant, the training provider, and a copy will be kept in the participant's file.

If the participant has failed a course WIOA will generally not pay for them to retake the same course again, meaning the participant will not receive additional funding for that specific training unless there are extenuating circumstances and approval from the Executive Director.

# Registered Apprenticeships

An On-the-Job Training (OJT) contract may be entered into with registered apprenticeship program sponsors or participating employers in registered apprenticeship programs for some or all of the OJT portion of the registered apprenticeship program, consistent with the guidelines of the CAWDB Registered Apprenticeship Policy. Depending on the length of the registered apprenticeship, the OJT may last for some or all of the registered apprenticeship training.

## References:

Workforce Innovation and Opportunity Act of 2014 CAWDB Supportive Services Policy Training and Employment Guidance Letter (TEGL) 10-09 CFR 680.310(d) 20 CFR 680.320(a)

Approved by: Michael Horse

Date: 12 9-2024

Title: CAWDB Chairperson