

## **Subject: Individual Training Accounts and Workforce Preparation Services**

**Policy No: 2015-04**

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### **Purpose**

This policy provides guidance on Individual Training Accounts (ITA) for training services and Workforce Preparation Services under Title I of the Workforce Innovation and Opportunity Act ([WIOA Section 134\(c\)\(3\)\(G\)](#)) or discretionary funds administered by the Benton-Franklin Workforce Development Council (BFWDC).

### **Background**

WIOA Title I Training services are provided in a manner that maximizes customer choice in the selection of eligible training providers. Subrecipients shall support consumer choice to enable individuals to make a responsible and informed decision to receive training by providing:

- Individual Training Accounts (ITAs)
- A statewide Eligible Training Providers List (ETPL)
- Consumer information regarding training providers

Using ITA funds, WIOA Title I adults, dislocated workers, and youth between ages 16-24, when appropriate, purchase training services from eligible training providers they select in consultation with subrecipient staff. Customers receiving training under this approach shall receive information about skill assessments, labor market conditions and trends, and training provider performance information to make informed choices about their employment future and the training services needed to support their decisions.

## **Operational Procedure**

### **A. Individual Training Account (ITA)**

Training services under the Workforce Innovation and Opportunity Act (WIOA) typically must be provided by training providers who receive payment for their services through an Individual Training Account (ITA). The ITA is a payment agreement established on behalf of a WIOA participant with a training provider. WIOA Title I participants purchase training services from State eligible training providers they select in consultation with the career planner, which includes a discussion of program quality and performance information on the available eligible training providers.

Participants are expected to take an active role in managing their employment future using ITAs and other wrap-around supports. Training services are not entitlements and shall be provided to participants, who, at a minimum, receive either an interview, evaluation, assessment, and career planning. Participants shall be unlikely or unable to obtain or retain employment that leads to self-sufficiency through career services alone. ITA's training services, including entrepreneurial training (also known as self-employment training), must be necessary to the success of the participant's Individual Participant Plan (IPP). The IPP shall justify the services to be provided, including the appropriate combination of training and other services for the participants to achieve their employment goals.

There is no requirement that career services be provided as a condition to receive training services; however, if career services are not provided before training, documentation shall explain how the participant's eligibility for training services was determined.

Training services are provided to equip individuals to enter the workforce and retain employment. Subrecipients shall provide WIOA eligible individuals the opportunity to enroll in self-employment training programs on the same basis as they are provided the opportunity to enroll in other WIOA funded training services, including:

- 1) Occupational Skills Training
- 2) On-the-Job Training (OJT)
- 3) Registered apprenticeship which incorporates both OJT and classroom training
- 4) Pre-apprenticeship training
- 5) Workplace training with related instruction
- 6) Training programs operated by the private sector,
- 7) Transitional jobs
- 8) Skill upgrading and retraining.

### **B. Training Payments and Limits to ITA Funding Amounts**

The funding level of ITA's shall be determined on a case-by-case basis and limited to the needs identified in each participant's IPP contingent on the availability of funds.

- 1) When awarding an ITA, consideration shall be given to the availability of other sources of grants, excluding loans, to pay for training costs. WIOA funds shall supplement but not replace other sources. WIOA funds are intended to provide training services in instances when there is no grant assistance or insufficient

assistance from other sources (i.e., Temporary Assistance for Needy Families (TANF), Basic Food Employment and Training (BFET), Title IV Programs, and state-funded grants) to pay for those costs ([20 CFR 680.310](#)). The use of WIOA funds to pay down a loan of an otherwise eligible participant is prohibited; however, the mere existence of a federal loan shall not impact eligibility determinations.

- 2) ITA payments may be made through a Purchase Order (PO) system or other appropriate methods. The PO or voucher should document a three-way commitment between the participant, service provider, and training institution and obligate funds for the Program Year (PY). If additional ITA funds are required beyond the PY (two-year cycle) to assist the participant in completing their training plan, a new PO or voucher shall be awarded at the beginning of the next PY. Payments may be made incrementally at different points in the training course. This PO or voucher system shall document de-obligations as participants receive additional resources and/or leave the training program before completion.
- 3) ITAs shall be limited to a maximum amount of up to \$10,000, which does not include supportive services but does include tuition, books, course-required software, lab fees, and other associated costs required by the program. The \$10,000 maximum (ceiling) amount is the ITAs lifetime participant limit within all WIOA programs. ITAs may average far less than the prescribed maximum amount of \$10,000, depending upon the customer's need.
- 4) ITA vouchers can be written for specific amounts that partially or fully support the overall goal of the customer's training plan. Expenditures from all resources paying for a participant's training shall be documented in case notes and the State's Management Information System (MIS). Waivers to ITA limits may be considered under special circumstances by submitting a written request to the BFWDC for approval with justification explaining why further funding is needed.
- 5) If a participant satisfactorily completes one ITA curriculum but, consistent with the overall goal of the training plan, requires an additional ITA, and the amount needed remains below the \$10,000 limit, a second ITA may be awarded. Subrecipient shall provide documentation to the WIOA Programs Manager for approval justifying why the participant needs further training to obtain employment within their occupational goal.

### **C. Use of ITA Funds**

If an ITA has been established and the training is managed between WIOA Title I subrecipient staff and the participant, those funds may be used to pay for allowable training-related expenses as well as tuition expenses. If the training provider was selected by the WIOA Title I participant and the subrecipient, but the source of payment for training is Pell, other financial aid, or private scholarships, a WIOA funded ITA may be used to pay allowable training costs not covered by those fund sources. A WIOA-funded ITA is not appropriate if the WIOA Title I subrecipient staff and program played no role in training provider selection and the participant's training is selected, funded, and directed by a program other than Title I, such as Vocational Rehabilitation (VR), Trade Adjustment Assistance (TAA), or community and technical colleges (Worker Retraining (WRT)).

However, if such funding ends after training has started, a WIOA Title I-funded ITA may be initiated if that program is on the ETPL.

#### **D. Assessments Before Training**

Before expending training funds, participants shall receive a comprehensive assessment via intake interview, evaluation, or standardized basic skills assessments and career planning to determine whether they have the aptitude, skills, and support to complete training.

When a participant requests an Individual Training Account (ITA), the assessment shall be included as part of the ITA request. Valid and appropriate assessment instruments shall be approved by the Benton-Franklin Workforce Development Council (BFWDC) before implementation. Assessment results will be discussed with the participant and documented in case notes and/or ITA contracts.

To avoid duplication of services, WIOA allows using previous assessment results from other education or training programs if the assessment has been conducted within the past six months. The assessment results shall indicate the participant's ability to complete the training successfully. The BFWDC shall approve the assessment instruments used by other education and training programs. Assessment documentation shall be obtained from the certified site and placed in the participant's file.

Exceptions for not conducting a comprehensive assessment before training include:

- Short-Term Pre-Vocational Services lasting less than 40 instructional hours or costing \$500 or less.
- On-the-Job Training or Work Experience opportunities as the purpose is to develop soft skills and job-specific skills.
- The participant provides transcripts showing satisfactory grades in classes completed in the requested training (or in a directly related training) for their chosen occupation.
- The participant is currently in school for the same occupational training and provides transcripts showing satisfactory progress.
- The participant has earned a postsecondary degree and provides a transcript or other academic documentation. If the participant's previous postsecondary degree supports in-demand occupations currently, WIOA contracted staff shall explain the need for additional training in case notes.

WIOA subrecipient staff shall case note the reason a comprehensive assessment was not administered before awarding an ITA.

#### **E. Applying for Financial Aid**

If the training provider accepts financial aid, participants shall apply for financial aid each year. The subrecipient shall obtain a copy of the award or denial notification and place it in the participant's file.

#### **F. Duration of Training Services**

The duration of ITA's shall be determined on a case-by-case basis and identified on the ITA.

## **G. Satisfactory Progress in Training**

Participants are required to make satisfactory progress in training ([WAC 192-270-065](#)), except for a good cause (see Section P – Definitions) to access all payments of their ITA's. Satisfactory progress is defined as follows:

- 1) The participant's grade point average does not fall below 2.0 for more than two consecutive quarters or semesters,
- 2) The participant maintains a grade point average sufficient to graduate from, or receive certification in, their approved area of study; and,
- 3) The participant is completing sufficient credit hours to finish their approved course of study within the time frame established under their approved training plan.
- 4) In the case of self-paced or non-graded learning programs, satisfactory progress means participating in classes and receiving a certificate of completion or passing certification exams within the time frame established under their approved training plan.
- 5) Subrecipient shall obtain transcripts from the participant for each school term or a summary of progress at the end of each quarter from training providers that do not use letters or number grades.
- 6) Subrecipient shall arrange to receive transcripts/progress reports from participants in adequate time before proceeding with subsequent tuition payments.

## **H. Eligible Training Providers**

- 1) An ITA shall only be issued for training provided by an eligible provider of training services whose course program is on the Washington State ETPL or from states with reciprocity agreements with Washington State posted on the Internet at [www.careerbridge.wa.gov](http://www.careerbridge.wa.gov).

States with which Washington has a reciprocity agreement:

- [Idaho](#)
  - [Illinois](#)
  - [Missouri](#)
  - [Montana](#)
  - [Oregon](#)
  - [Utah](#)
- 2) Participants shall have access to the list of eligible providers through the One-Stop system. Participants may select WIOA training services available from eligible training providers and programs on the State ETPL.
  - 3) Eligible providers of training services are entities that are eligible to receive WIOA Title I-B funds. The ETPL is an approved-vendor list rather than a list of programs approved for occupational skills training.
  - 4) For training to be considered Occupational Skills Training, specific criteria shall be met according to [§681.540](#), which states that the training shall:

- Be outcome-oriented and focused on an occupational goal specified in the individual service strategy,
- Be of sufficient duration to impart the skills needed to meet the occupational goal; and
- Lead to the attainment of a recognized postsecondary credential.

5) Eligible providers of training services may include:

- Institutions of higher education that provide a program leading to a recognized postsecondary credential,
- Entities that carry out programs registered under the National Apprenticeship Act,
- Other public or private providers of a program of training services, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under title II if such activities are provided in combination with occupational skills training; and
- Local Boards who meet the criteria in [WIOA Section 107\(g\)\(1\)](#).

## **I. Out-of-State/Out-of-Area Providers**

All training programs shall be within a reasonable commute of Benton and Franklin counties. Out-of-area training programs that are not within commuting distance to Benton and Franklin counties may be approved on a case-by-case basis pending the participant demonstrating the ability to incur all extraordinary costs, e.g., living expenses. All approved training shall be located within the contiguous United States, and those training providers shall be listed on that state's ETPL.

When a training program is removed from the State ETPL, the ITA shall be honored for the participants already enrolled and funded by an ITA at that institution (see [WIOA Title I Policy 5611](#)). ITA's should not be modified or extended for participants beyond the initially planned end date for a program of training that is no longer on the ETPL.

## **J. Prerequisite Training**

Prerequisite training to a vocational training program may be funded if required by the educational institution and ultimately leads to a credential in a demand occupation. Academic training may be approved if it meets specific requirements for certification, licensing, or the skills needed for an occupation on the demand occupations list. Prerequisite or pre-vocational training may be considered an individualized career service.

## **K. Demand Occupations**

Consideration shall be given to labor market demand in the local area or the area the participant intends to relocate. Training shall be limited to skills relevant to demand occupations. Training services may be approved for occupations that the local board has determined to be in sectors of the economy that have a high potential for sustained growth or where documentation indicates employment prospects in the local area in addition to those occupations on the demand list.

Per DOL guidance, registered apprenticeship programs are in-demand even if the labor market information does not list the occupation for which the individual is an apprentice as “in-demand” because registered apprenticeship programs are tied to specific employers and only enroll individuals when there is employer demand.

#### **L. Disability Waivers**

In individual cases, the BFWDC may extend the duration of training for individuals with physical or sensory disabilities or other unusual circumstances when it is determined necessary for the individual to obtain employment.

#### **M. Registration Time Limit**

Once a participant is awarded an ITA, the participant shall be enrolled in approved classes/training within 30 days from the ITA approval date. ITA’s shall not pay for late fees caused by customer error or delay. The participant shall be responsible for these fees and any additional fines or penalties.

#### **N. Communication with Participants**

Subrecipient shall provide regular coaching to participants enrolled in approved training and awarded an ITA. Coaching shall include information deemed relevant/pertinent to the participant by subrecipient.

#### **O. Modified IPP/Subsequent ITA**

Under certain circumstances, it may be necessary to modify an ITA. An ITA shall be modified when the original scope of training has changed, such as length of time, start/end dates, course requirements, or overall cost. A participant may only modify their Individual Participant Plan with approval from subrecipient and case notes shall document why a modification is needed.

#### **P. Availability of Funds Disclaimer**

Training resources for participants are contingent upon the availability of funds provided by WIOA. Participants shall be notified as soon as possible if a WIOA program will have insufficient funds to continue payments for tuition and fees.

#### **Q. Exceptions to ITA’s**

The BFWDC reserves the right to implement authorized exceptions to the use of ITAs per [WIOA Section 134 \(c\)\(3\)\(G\)\(i\) and \(ii\)](#). Contracts for training services may be developed under the following conditions:

- 1) When the services provided are on-the-job-training, customized training, incumbent worker training, or transitional jobs.

- 2) The Local Board recognizes an insufficient number of eligible providers in the local area and uses other qualified training providers to maximize customer choice of training options.
- 3) The Local Board determines there are training service programs of demonstrated effectiveness offered in the area by a community-based organization (CBO) or other private organizations to serve participants with barriers to employment. The Local Board's criteria for determining demonstrated effectiveness, particularly as it applies to special participant populations, may include:
  - Financial stability of the organization,
  - Demonstrated performance in measures appropriate to the program, including program completion rate; attainment of the skills, certificates, or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and
  - How the specific program relates to the workforce investment needs identified in the local plan.
- 1) The Local Board determines it would be appropriate to award a contract to an institution of higher education or other eligible provider of training services to facilitate the training of multiple participants in an in-demand industry sector or occupation, and the contract does not limit customer choice.
- 2) When the Local Board is considering entering into a pay-for-performance contract consistent with [§ 683.510](#).

## **R. Recovery of Tuition Funds**

If a participant discontinues training, the subrecipient shall demonstrate their due diligence to ensure the recovery of WIOA funds paid to the training provider by:

- 1) Reviewing the refund policy of the training provider for early termination from the training program,
- 2) Ensuring training providers are aware of the requirement to notify subrecipient staff if a participant discontinues training,
- 3) Verifying the percentage of the advanced payment training providers will refund upon non-completion of courses,
- 4) Confirming the turnaround time to receive the refund,
- 5) Confirming the amount of time a participant can attend training before a refund is not honored.

Subrecipient staff is responsible for following the procedures outlined below upon early termination of an ITA:

- 1) Determining if a refund is due upon early termination of participant's training,
- 2) Collecting any outstanding training or tuition refund,
- 3) Documenting the outcome in case notes.

## **S. Tracking ITAs**

Subrecipient will track participants enrolled in training, number of trainings completed (to determine the completion rate), and credentials earned. These numbers will be included in the monthly reporting submitted to the BFWDC.

## **T. Workforce Preparation Services**

Workforce preparation services are designed to prepare a participant for work but do not provide formal Occupational Skills Training. As such, they are not appropriate for an ITA. Workforce preparation services shall be less than 40 instructional hours or cost \$500 or less. These activities help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources and information working with others, understanding systems, and obtaining skills necessary for successful preparation, transition into, and completion of postsecondary education, training, or employment. The following activities meet the definition of workforce preparation services, but do not count as a credential or occupational skills training. Workforce preparation services include, but are not limited to:

- 1) Basic Life Support (BLS)
- 2) Cardiopulmonary Resuscitation/1<sup>st</sup> Aid Card
- 3) Digital Literacy
- 4) Food Handlers Card
- 5) Human Immunodeficiency Virus (HIV)
- 6) Mandatory Alcohol Server Training (MAST)
- 7) Occupational Safety and Health Administration 10 (OSHA 10)
- 8) State Training and Registry System (STARS) - Training for Childcare Providers

Workforce preparation services shall be recorded in the State Management Information System (MIS) for each activity. Measurable Skill Gains should not be recorded in the MIS as these activities do not count as occupational skills training.

## **U. Basic Skills Services**

Basic skills instruction is intended to prepare the individual for further training, future employment, or retention in present employment. Includes remedial reading, writing, mathematics, literacy training, study skills, English for non-English speakers, bilingual training, and GED preparation (including computer assisted competency training, and school to post-secondary education transition), some continuing education, and basic computer literacy.

## **V. Definitions**

**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:

- 1) Illness, injury, or disability of the participant or a member of the participant's immediate family,
- 2) Severe weather conditions or natural disaster precluding safe travel,

- 3) Destruction of the participant's school records due to a natural disaster, or other catastrophes not caused by the participant;
- 4) Acting on advice received from an authority such as the training provider, instructor, or subrecipient staff,
- 5) Training is delayed or canceled,
- 6) Accepting stop-gap employment with hours or other work conditions that conflict with the training,
- 7) Accepting goal-related employment before completion of training.

## **W. References**

- WIOA Section 134(c)(3)(G) – Adult and Dislocated Workers
- WIOA Section 134(c)(3)(G)(iii) – Linkage to occupations in demand
- WIOA Section 129(c)(2)(D) – Youth
- 20 CFR 680.300, 680.310, 680.320, 680.330 – Adult and Dislocated Workers
- 20 CFR 681.550 – Youth
- Training and Employment Guidance Letter (TEGL) 19-16, Section 7
- Training and Employment Guidance Letter (TEGL) 21-16, Section 7
- Training and Employment Guidance Letter (TEGL) 08-19, Attachment I
- WAC Chapter 192-270 (Training Benefits)
- [WIOA Title I Policy 5611 – Governor's Procedures for Determining Training Provider Eligibility](#)
- [WorkSource Services Catalog](#)