# South Central Iowa Workforce Area Local Workforce Development Board Title I Individual Training Accounts (ITA) Policy

Memo No: 22-2

Approved Date: 1.27.2022 Effective Date: 11.9.2021

A legacy clause to this policy provides for inclusion all active participants under Region 15 Policy Memo 16-1 Individual Training Account Policy within this policy.

#### References

Workforce Innovation and Opportunity Act (WIOA) Final Rules Workforce Services Policy Chapter 8 WIOA Title 1B Programs

#### **Purpose**

This policy outlines South Central Iowa Workforce Area Local Workforce Development Board (SCIWA LWDB) directives for providing Individual Training Accounts for the WIOA Adult, Dislocated Worker, and Youth Programs.

# Background

WIOA Title I-B training services for WIOA eligible adults, dislocated workers and youth are provided through ITAs. Using ITA funds, WIOA eligible adults, dislocated workers, and youth purchase training services from eligible training providers they select in consultation with a WIOA career planner. Participants are expected to utilize information such as skills assessments, labor market conditions/trends, and training providers' performance, and to take an active role in managing their employment future through the use of ITAs.

# **Substance**

ITAs are one training option available to eligible and appropriate participants when it is determined by a career planner that they will be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone. An ITA is limited in cost and duration and must result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment. ITAs are allowed for out-of-school youth ages 16-24 per WIOA Section 129(c)(2)(D) and 20 CFR 681.550.

ITAs are not entitlements and shall be provided to eligible participants on the basis of an individualized assessment of the person's job readiness, employment and training needs, financial, social and supportive needs, labor market demand and potential for successful completion, as documented on the participant's Individual Employment Plan (IEP). Participants choose career training with Eligible Training Providers in consultation with career planners.

ITA funding for training is limited to participants who:

- Complete an assessment and an IEP that identifies the selected training course;
- Are unable to obtain grant assistance from other sources to pay the costs of training or require
  assistance beyond available grant resources from other sources, such as Pell Grants in order
  to complete their training goals;
- Select training programs that are directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area or in the



planning region or in another area in which the participant is willing to travel or relocate [WIOA Section 134(c)(3)(G)(iii)]; and

Maintain satisfactory progress/grades throughout the training program.

# Coordination of WIOA Training Funds and Other Federal Assistance

(20 CFR 680.230) WIOA funds are intended to provide training services in instances when there is no grant assistance, or insufficient assistance from other sources such as, but not limited to: Temporary Assistance for Needy Families (TANF); Title IV Programs such as Federal Pell Grants, or Federal Work-Study; GI Bill or other Federal financial aid available to military veterans; and state-funded grants to pay for those costs. An individual may select training that costs more than the \$6,000 WIOA maximum amount, when other sources of funds are available to supplement the ITA. Career planners must consider and document in the participant file the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. The use of WIOA funds to make payments towards a personal loan of an otherwise eligible participant is prohibited. However, the mere existence of a federal loan, regardless of the status, must not impact ITA eligibility determinations.

### **ITA Authorization**

ITAs must be approved by a Title I program manager prior to issuance. ITAs are authorized only for training programs listed on the Eligible Training Provider List (ETPL), as required in WIOA Section 134(c)(F)(iii). ITA funds are paid directly to the training provider. ITAs may be used for pre-apprenticeship programs however, only pre-apprenticeship programs listed on the ETPL may be approved. ITAs are not authorized for individualized career services such as short-term prevocational training.

#### **ITA Funding Limit**

The limit for ITA contracts is \$6,000 per fiscal year. The maximum ITA limit is not an entitlement. The amount and duration of each participant's ITA award is determined on an individual basis. Funding amounts will take into account the total costs of the selected training program, any other financial assistance available to the participant, and the WIOA funding available to the Adult, Dislocated Worker or Youth Programs. The ITA funding can only include the cost of training services such as tuition, books, individual materials, supplies, tools, and equipment. An ITA may fund prerequisite training to a vocational training program if it is required by the educational institution.

# ITA Continued Funding

Continued funding of an ITA is contingent on availability of WIOA funds and on the participant's satisfactory progress in school. Career planners will review the participant's training progress and expenses quarterly or more frequently depending on the training institution's schedule. An individual's progress will be considered satisfactory upon earning:

- A grade point average that does not fall below 2.0 for two consecutive terms; or
- A grade point average sufficient to graduate from, or receive certification in, the individual's approved area of study; or
- Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.
- 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 approved training plan.
- Career planners must arrange to receive training progress reports (i.e. transcripts) from participants in adequate time to process the subsequent tuition payment.



• Career planners must develop with participants who are not earning satisfactory progress in their coursework, a service strategy to overcome the barriers impacting progress. WIOA ITA funding may be terminated if participants do not earn satisfactory progress for two (2) or more consecutive school terms (i.e. quarters, semesters, etc).

#### **ITA Modifications**

An ITA may be modified to ensure the individual attains their educational goals and subsequent employment. In some circumstances, such as when a program of training is removed from the ETPL, or when extraordinary program expenses develop, the participant and career planner must agree on whether to complete the plan of training with the existing provider, seek a similar program, or discontinue training. When a program of training is removed from the state ETPL, WIOA participants in that program can complete their training. However, an ITA should not be modified or extended for a participant beyond the original plan approval as it relates to a program of training that is no longer on the ETPL. Any modifications to the ITA should be documented in case notes located in lowaWORKS.

# **Participant File Documentation**

Justification for, and continued funding of an ITA must be supported by the following documentation located in the participant file and/or in case notes entered in lowaWORKS:

- Assessment results supporting the selected program of study. The assessment must support
  the need for training including a determination by a case manager that the participant will be
  unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages
  from previous employment through career services alone; and that the selected program of
  study will result in employment leading to economic self-sufficiency or wages comparable to or
  higher than wages from previous employment;
- Completed IEP documenting the selected program of study, anticipated and actual start/end dates and training outcomes;
- Eligibility for other training grant funding;
- Verification of FAFSA application and award status each year, if applicable. Authorization of the ITA and any approved increase or modification;
- Documentation of the participant's Measurable Skill Gains.

#### Action

All staff will follow the policies outlined.

#### Contact

If there are any questions related to the information in this issuance, contact Krista Tedrow at <a href="mailto:sciaworkforceboard@gmail.com">sciaworkforceboard@gmail.com</a>.

A legacy clause to this policy provides for inclusion all active participants under Region 15 Policy Memo 16-1 Individual Training Account Policy within this policy.

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South Central Iowa Local Workforce Development Board Chair

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