

Region 4 Workforce Board
Individual Training Accounts Policy-Adult

PURPOSE: To provide WIOA Region 4 guidance regarding the use of Individual Training Accounts.

REFERENCES WIOA §134(c)(3), 20 C.F.R. Parts 680 et al, 29 U.S.C. 3101 et seq.,DWD Policy 2017-09
Guidance Related to WIOA Individual Training Account Funding; TEGL 19-16

Background

Training services can be critical to the employment success of many adults and dislocated workers. Staff may determine training services are appropriate, regardless of whether the individual has received basic or individualized career services first, and there is no sequence of service requirement.

Under WIOA, training services may be provided if staff determines after conducting an interview, an evaluation, or assessment, and career planning, that the individual:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone;
- 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;
- Has the skills and qualifications to successfully participate in the selected program of training services;
- Is unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds or Federal Pell Grants or requires WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants;
- Is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination. If the petition is certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA;
- Is determined eligible in accordance with the State and local priority system in effect for adults served under the adult funding stream; and
- Selected a program of training services from the Eligible Training List and that is directly linked to occupations in demand (see attachment A) or in another area to which the individual is willing to commute or relocate. Exceptions to the locally recognized Demand & Growth Occupation list will require R4WDB (or designee) approval.

Individual Training Accounts for Workforce Innovation and Opportunity Act (WIOA)

An ITA is one of the primary methods through which training is financed and provided for WIOA participants. ITAs are established on behalf of the WIOA participant to purchase a program of training services from a provider on the Eligible Training Providers List (ETPL) selected in consultation with the case manager. Indiana's eligible training provider list can be found on the INTraining website (<https://webapps.dwd.in.gov/INTraining>).

A program of training services is defined as a structured regimen leading to:

- Recognized post-secondary credentials; or
- Secondary school diploma or its equivalent; or
- Employment; or
- Measurable skill gains toward credentials or employment.

ITAs are authorized for use in providing occupational training services to adult and dislocated worker customers and shall conform to the following requirements:

Before receiving training services under WIOA:

- eligibility determination for specific services is required; and
- a determination of need must be made using an Individual Employment Plan
- Complete Client Budget Worksheet to verify need and ability to complete training
- case notes must contain a determination of need for training services, as determined through the individual employment plan.

Staff must determine whether or not training services are appropriate for WIOA participants. Determination of appropriateness must be done by completion of an interview, evaluation or assessment, and career planning.

Assessment may include, among other things:

- A combination of standardized tests
- Inventory of participants' interests
- Skills assessment
- Career exploration
- Alignment with available labor market information

If an ITA is being used for a post-secondary institution's credit-bearing courses, it may only be used for non-developmental courses.

- An ITA should not be used to pay for remedial or developmental courses at a post-secondary institution.
- Customers who must take remedial or developmental courses prior to entering a post-secondary institution should be referred to Adult Education for remediation.
- Training programs must be within a reasonable commute of the local area.
- Training programs that are outside Region 4 or beyond a reasonable commuting distance must be approved by the R4WDB (or designee) on a case-by case basis.

Maximum Duration of ITA:

Duration of an ITA is dependent upon the customer's goals, resources & available training.

- The R4WDB will support individuals pursuing a 2-year or less certification or degree program geared toward an occupation in demand with one of the Eligible Training Providers.
- The R4WDB will fund the first 2-years of a 4-year program if that program results in an associate degree after the first 2 years.
- The R4WDB will fund the last 2 years of a 4-year program if that program results in a completion of a bachelor's degree.
- WIOA funds will not be utilized to fund Associate's or Bachelor's Degrees in General Studies. [TAB 2005-004]

Maximum Funding and Allowable Costs for Training:

ITA funding amounts may vary from customer to customer based upon the needs of the customer; however, the maximum ITA *tuition* amounts for one year should not exceed **\$5000**. Exceptions must be approved by WDB designee. The reasoning and the exception should be noted in the customer's case notes.

- ITA expenditures are costs required by the training provider to complete the training.

- ITA costs required to complete the training may include, but are not limited to:
- Tuition and fees
- Books
- Tools
- Uniforms
- Tests (Background Check)
- Medical immunizations/tests

ITAs may not be used for payment of late fees, fines, or penalties caused by customer error

ITA costs do not include any supportive services' costs related to the ITA (e.g. transportation or child care).

Coordination of Funding:

A comprehensive assessment of the cost of the ITA, which involves accessing other grants or funding, including Federal Pell Grants, Trade Adjustment Assistance (TAA), and scholarships, must be conducted to ensure best utilization of WIOA funds. WIOA funds are not the payer of last resort.(see DWD policy 2017-09)

Other Considerations for ITA's:

Training services must be provided in a manner which maximizes informed consumer choice in selecting an eligible provider. When participants select an eligible training provider, they should consider providers who are eligible for financial aid to ensure best utilization of WIOA funds. Our local ITA policy should not be construed that a participant cannot be served because the training in an in-demand occupation exceeds the maximum ITA funding limit. Exceptions must be approved by the board designee.

Budget and Financial Analysis

Service Providers must ensure that WIOA funds are not used to pay training costs that were paid by the participant (or other source) prior to WIOA program registration.

All recipients of an ITA must submit a FAFSA form and utilize any Pell Grants received prior to utilizing an ITA (as applicable for Pell eligible institutions).

A WIOA participant may enroll in WIOA-funded training while the participant's application for a Pell Grant is pending, as long as the Service Provider has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant. If the Pell Grant is subsequently awarded, the training provider must reimburse the Board (Service Provider) the WIOA funds used to underwrite the training for the amount the Pell Grant covers. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses, which includes support services.

- Customers shall not be required to apply for or access student loans or incur personal debt as a condition of participation
- The participant may incur personal debt when agreed to and after counseling regarding the responsibilities associate with the indebtedness, including loan repayment. It is the intent of this policy to preserve the element of choice in a WIOA customer's selection of a training provider. The customer may choose to pay for the non-WIOA funded portion of his/her training through grant/aid/loan resources available through a proprietary education institution or through his/her own resources.

Service Providers must have a process in place to ensure payment will not be made to training vendors when the participant has withdrawn or dropped classes in accordance with the training vendor's non- payment policy.

ITA Voucher Content

Vouchers are to be completed in ICC and signed by the case manager/team lead. Vouchers are to be scanned into ICC documents. All items must be completed on voucher. If not applicable, enter NA.

Attachment B – Financial Award Analysis Form

Effective date: July 2018

Region 4 Demand and Growth Occupations 2018
Accountant and Auditors
Architectural and Engineering Managers
Assemblers & Fabricators
Automotive Service Technician/Mechanic
Bookkeeping, Accounting, and Auditing Clerks
Bus and Truck Mechanics and Diesel Engine Specialists
Carpenters
Child Care Workers (except Private Household)
Clinical Laboratory Technologist
Commercial/Industrial Truck Drivers/Operators
Computer and Information Systems Manager
Computer Numerically Controlled Operator/Programmer (CNC)
Computer Software Developers
Computer Systems Analyst
Construction Laborers
Construction Manager
Correctional Officer
Counselor
Customer Service Representative
Dental Assistant
Dental Hygienist
Education Administrator
Educational, Vocational, and School Counselors
Electrical and Electronic Engineering Technicians
Electrician
Electronics Engineers, Except Computer
Elementary, Middle School and Secondary School Teacher
Emergency Paramedic, EMT
Executive Secretaries and Administrative Assistants
Financial Managers
First-line Supervisors/Managers of Construction Trades & Extraction Workers
First-line Supervisors/Managers of Mechanics, Installers, & Repairers
First-line Supervisors/Managers of Office and Administrative Support Workers
First-line Supervisors/Managers of Production & Operating Workers
First-line Supervisors/Managers of Retail Sales Workers
First-line Supervisors/Managers of Transportation & Material-moving machine and vehicle operators
General and Operations Manager
General Office Occupations
Heating, Air Conditioning, and Refrigeration Mechanics and Installers
Industrial Engineers

Industrial Production Manager
Industrial Machinery Repairers/Maintenance
Industrial Truck and Tractor Operators
Inspectors, Testers, Sorters, Samplers, and Weighers
Licensed Practical Nurse (LPN)
Machinist
Maintenance and Repair Workers
Management Analyst
Manufacturing Production Technician
Material Moving Worker
Mechanical Engineers
Medical and Clinical Laboratory Technologist
Medical and Health Services Manager
Medical Assistant
Medical Record and Health Information Technician
Multiple Machine Tool Setters, Operators, and Tenders, Metal and Plastic
Network and Computer Systems Administrator
Nursing Assistant
Occupational Therapists
Pharmacist
Pharmacy technicians
Plumbers, Pipefitters and Steamfitters
Police and Sheriff's Patrol Officers
Postsecondary Teachers
Precision Electrical & Electronic Equipment Assemblers
Precision Metal Workers
Production Workers
Radiological Technologist
Registered Nurse (RN)
Respiratory, Occupational, Physical Therapist
Sales Representatives
Security Guards
Shipping, Receiving, and Traffic Clerks
Social Workers
Special Education School Teacher
Surgical Technologist
Team Assemblers
Tool & Die Makers
Truck Drivers, Heavy and Tractor-Trailer
Veterinarians
Welders, Cutters, Solderers, and Brazers

Region IV Workforce Board
Client Budget Worksheet

Client, SS #: _____

Date: _____

Monthly Income	Amount
Wages Earned:	
TANF	
Food Stamps	
Social Security	
Retirement	
WIC	
Child Support	
Property Income	
Work Study	
Other	
Other	
Other	
TOTAL INCOME:	\$ -
TOTAL INCOME:	\$ -
TOTAL EXPENSES:	\$ -
BALANCE/DEFICIT:	\$ -

Monthly Fixed Expenses:	Amount
Rent / House Pmt:	
Car Pmt(s)	
Insurance	
Medical/ Dental	
Perscriptions	
Loan 1	
Loan 2	
Loan 3	
Credit Card 1	
Credit Card 2	
Credit Card 3	
Other	
Other	
Other	
Other	
TOTAL FIXED EXPENSES:	\$ -

Monthly Variable Expenses:	Amount
Food	
Clothing	
Transportation	
Child Care	
Entertainment	
Toiletries	
Medical/Dental	
Water	
Gas	
Trash	
Electric	
Telephone	
Other	
Other	
Other	
TOTAL VARIABLE EXPENSES:	\$ -

By signing below, I agree that the above information is true and accurate. I realize that falsification could lead to suspension of all assistance.

Client's Signature

Date

Case Manager's Signature

Date

Attachment C

FINANCIAL AWARD ANALYSIS

TRAINING PROVIDER: _____

Workforce Innovation and Opportunity Act (WIOA) Participant:	Telephone #:	
Training Start Date:	Training End Date:	
Name(s)/Type(s) Of Training:	No. of Weeks/Semesters/Quarters:	
Training Provider Contact Person:	Telephone #:	Fax #:

Training Items Cost of Attendance	Fund Assignments (#1-6 Under Funding Sources)	Cost per Week/Semester/Quarter	Number of Weeks/Semesters/Quarters	Total Cost of Training Services
Application/Registration				
Tuition				
Books/Supplies				
Shop/Clinic/Lab Fees/Uniforms				
Physicals				
Licenses/Permits				
Parking Fees				
Student Activity Fees				
Transportation				
Child Care Cost				
Other Required Cost (specify)				
Other Required Cost (specify)				
Total Projected Cost of Training				

Available Funding Sources <i>(Documentation must be attached)</i>	Aid Per Semester or Quarter	Number Of Weeks/Semesters/Quarters	Total Available Resources
1. Federal Pell Grant <i>(attach Student Aid Report, etc.)</i>			
2. Scholarships/Grants/Other Financial Aid <i>(attach applicable award/denial letters)</i>			
3. Other Partner Sources <i>(specify)</i>			
4. Vocational Rehabilitation/Social Services			
5. Total Non-WIOA Available Resources			
6. Needed/Requested WIOA Training Resources			
7. Additional Resources Needed <i>(normally this should be a zero balance)</i>			

Provider's Signature

Date

Regional Staff Signature

Date