



COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
WORKFORCE DEVELOPMENT BOARD

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POLICY NO: 06-19
TO: Service Providers
FROM: Department of Social Services
EFFECTIVE: January 01, 2020
SUBJECT: Individual Training Accounts (ITAs)

REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA), Section 129 (c)(2)(D) and Section 134 (c) (G)
- WIOA Final Rule 20 CFR 680.300-680.330
- WIOA Final Rule 20 CFR 681.550

PURPOSE:

This policy provides guidance regarding the use of Individual Training Accounts (ITA's) for the procurement of training services for enrolled and eligible WIOA Title I participants. ITA's may be established on behalf of eligible individuals to fund occupational skills training programs identified on the State approved, Eligible Training Provider List (ETPL). Selection of program of training from the ETPL must include an analysis of skills assessments, labor market conditions/trends and the training provider's performance.

This policy is based on SLOWDB's interpretation of WIOA law, regulations and policies and federal, state and local laws, regulations and policies. This policy will be reviewed and updated based on any additional federal or state guidance.

BACKGROUND:

WIOA Section 134(d)(4)(G) identifies in general, training services shall be provided through Individual Training Accounts for eligible individuals through the America's Job Center of California (AJCC) delivery system. Training services provided through ITA's shall be directly linked to occupations that are in demand in the local area, the planning region or other area to which the participant is willing to locate. The local board may also approve training services for occupations determined by the local board to be in sectors

of the economy that have high potential for sustained demand or growth in the local area.

Training services provided under this section of WIOA shall be provided in a manner that maximizes informed consumer choice in the selection of an eligible provider. The local board shall make available the State list of eligible providers of training services with a description of the programs through which the providers may offer the training services and the performance information and performance cost information relating to eligible providers of training services. This ETPL is located on the State of California CalJOBS site at caljobs.ca.gov.

POLICY:

It is the policy of the San Luis Obispo Workforce Development Board (WDB) to fund training through Individual Training Accounts (ITAs) only with those vendors listed on the State of California Eligible Training Providers List (ETPL). The WDB has approved the issuance of ITAs not to exceed \$8,000 total cost, including tuition and other training-related items supplied by the training provider.

Exceptions to use of Individual Training Account

Training services may be provided pursuant to a contract for services in lieu of an individual training account if:

1. Such services are on-the-job training, customized training, incumbent worker training, or transitional employment; or
2. The local board determines there are an insufficient number of eligible providers of training services in the local area involved (such as in a rural area) to accomplish the purposes of a system of individual training accounts; or
3. The local board determines that there is a training services program of demonstrated effectiveness offered in the local area by a community-based organization or another private organization to serve individuals with barriers to employment.

The WDB must take action to authorize the use of contracts through items 2 or 3 above, prior to Service Providers using those rationales for training.

PROCEDURES:

Participant/Trainee Eligibility

To be eligible to receive an ITA, the participant must:

1. Be enrolled in the Adult, Dislocated Worker, or Out-of-School Youth program; and

2. Be assessed by a WIOA Service Provider staff member and be determined to be in need of training to secure or retain employment; and
3. Select an eligible training provider in consultation with Service Provider staff that is listed on the State of California's ETPL; and
4. Have an Individual Employment Plan (IEP) or Individual Service Strategy (ISS) in the participant file supporting the need for classroom training through an ITA and confirmation that completion of the training is likely to lead to employment;
5. Be unable to obtain grant assistance from other sources to pay the costs of their training; or
6. Require assistance beyond available grant assistance from other sources to pay the costs of such training.

Assessment

Individuals must, at a minimum, receive either an interview, evaluation, or assessment, and career planning with sufficient detail to enable the Service Provider staff to determine if the individual is eligible for and in need of training services. A partner program assessment, conducted within the past six (6) months, may be used in the evaluation process. The case file must contain a determination of need for training services as determined through the assessment process and must be documented in the IEP or ISS. The Service Provider staff must ensure the participant is making an informed selection based on assessments, local labor market information, training provider performance information and any other relevant information regarding the potential for the individual to gain employment upon completion of the training.

Career services are not mandatory prior to training services, however, if they are not provided prior to training, the case file must include documentation to justify the need to provide training without an interview, evaluation or assessment and career planning.

Service Provider staff must determine, through the assessment process, the following prior to approving training through the ITA:

1. 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; and
2. The individual is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable or higher than wages from previous employment; and
3. The individual has the skills and qualifications to participate successfully in training services.

Pell Grant Provisions

WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training, including such sources

as state-funded training funds, Trade Adjustment Assistance, and Pell Grants, or require WIOA assistance in addition to other sources of grant assistance, including Pell Grants.

Service Providers must coordinate funds available to pay for training and make funding arrangements with other partners and entities. Funding sources to consider include Temporary Assistance for Needy Families (TANF), state-funded training funds, and Pell Grants, so that WIOA funds supplement, rather than supplant, other sources of training grants.

A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the AJCC Service Provider has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the AJCC 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.

All WIOA participant's that are eligible for training must apply for financial aid prior to the start of training. A copy of the Free Application for Student Aid (FAFSA) must be available in the participant case management file if applicable. Failure to comply with this requirement will stop the approval of training funds. If the school/training program does not allow for the use of Pell Grants, it must be substantiated with a copy of the ETPL listing or other documentation and maintained in the participant file. Eligibility or denial of eligibility for Pell must also be recorded in a case note.

Documentation

The Service Provider must ensure adequate documentation is maintained for each participant, including but not limited to, the following:

1. Copy of the application or acknowledgement of application for Free Application for Federal Student Aid (FAFSA), or verification that the school does not allow for the use of Pell Grants.
2. Copy of the award letter verifying the participant is eligible to receive a Pell Grant, anticipated amount and dates of projected disbursement. If the individual is determined not eligible for a Pell Grant, documentation that supports the determination.
3. Upon receipt of Pell Grant, verification of the actual amount disbursed.

Individual Training Accounts

The following guidelines are to be followed:

1. ITA funding amounts must be consistent with the information listed on the ETPL. In no circumstance may the amount exceed the ETPL information.

2. Service Provider must establish procedures for remittance of costs to vendors associated with the ITAs and is solely responsible for ensuring payment is made on behalf of the participant.
3. Service Provider must only issue ITAs for training vendors that are evaluated, approved and placed on the ETPL.
4. In no event shall an ITA carry a time or dollar balance after the program of training is either completed or terminated.
5. The maximum length of training under a single ITA shall be two years.
6. More than one ITA may be issued to a participant within a two-year period provided the total cost of the ITA does not exceed \$8,000 and the trainings are related and necessary.
7. An ITA shall cover the cost of training, including tuition and other training-related items supplied by the training provider (e.g., books, license fees, training materials, registration fees, supplies, uniforms, DMV printouts, physical examinations, immunizations, health fees and insurance) but will not include the costs of supportive services.
8. Training services must lead to an industry recognized certificate, license, credential or degree.

Service Providers must develop and implement policies and procedures that describe the process to be used to determine participants as eligible, suitable and able to benefit from occupational skills training. The policies and procedures must include:

1. Any requirements and/or research that must be conducted prior to approval of an ITA, such as: labor market information research, interview with schools, etc.
2. Development of IEP, ISS and/or other career planning to substantiate the need and suitability of selected training program.
3. Evaluation of available resources to fund the training and ensure there is no duplication of funds.
4. Requirements for timely entry of data, including activity and case notes.
5. Monthly contact requirements and follow up regarding attendance and progress, grades, Pell grants and identification of any new or recurring supportive service needs.
6. Timely collection of tuition refunds (as outlined in the training vendor's refund policy) when the participant is unable/unwilling to complete the training program.

EXCEPTION TO POLICY:

There may be extenuating circumstances that would warrant an exception to this policy. Any authorizations exceeding the ITA parameters as listed in this policy must be approved by the DSS WIOA Program Manager or WDB Director.

AVAILABILITY OF FUNDING:

Service providers will take necessary steps to disburse WIOA participant training funds in a manner to provide services throughout the program year to customers who are in

need and to meet State-mandated Participant Training Expenditure requirements as outlined in the Service Providers' contract with DSS.

ACTION:

WIOA Title I Service Providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

INQUIRIES:

Any questions regarding this policy may be directed to the DSS WIOA Program Manager at 805-781-1838.

Workforce Development Board (WDB) Approval Required? Yes No

Initial approval date: 10/09/2019

WDB revision approval date: _____