PACIFIC MOUNTAIN
WORKFORCE
PacMTN **DEVELOPMENT**

**TITLE: WIOA Youth Individual
Training Accounts (ITA) Procedures
7100P**

Type: Program Procedure

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Date Last Revised:

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Status: Final

Supersedes: WIA Procedures in Policies #
520R2

Basic Procedural Expectations

Need for Training
Program staff must ensure that the career exploration activities which must be completed by the participant and the ITA request support the likelihood of the participant being successful in training with the probability of employment as the outcome.

Use of Previous Assessments
If program staff choose to use a previous interview, evaluation or assessment it must be noted in case notes and or included in the participant file.

Time Limits
Per local policy an ITA is limited to six (6) quarters of school. Program staff must submit a waiver to request an allowance for additional time for completion of the program of training.

Funding Limits
Program staff should use the applicable request form to document that a training cost is allowable, reasonable, justified and not otherwise available to the participant.

Program staff should work with the participant to determine how they will fund additional quarters if they choose to continue in school after completing their WIOA educational goal.

Participants Must Apply for Financial Aid
Program staff must confirm that participants have applied for financial aid each year and a copy of the award or denial notification must be placed in the file.

How ITAs are Authorized
Before any WIOA Title 1 training funds are expended, an ITA request must be approved by WIOA program staff.

Demand Occupation Requirement
Program staff must confirm the ITA program of training is for a demand occupation as designated on the Washington State Demand/Decline List. Verification that the occupation is in demand must be included in the file along with the ITA request. Program staff must submit a waiver to request that approval of training in an occupation showing as "Balanced, or In-Decline" on the demand list.

Eligible Training Provider List (ETPL) Requirement
Program staff must confirm the ITA program of training and training provider is on the Washington State ETPL for the local WDA or another WA State WDA (if the participant is

able and willing to commute or relocate), or it may be on another state's list at the time of the ITA approval.

Training Programs Removed from an ETPL

Program staff may not modify or extend an ITA when a program of training is removed from the Eligible Training Provider List however, a participant may continue and complete their program of training, as originally approved.

Time Limit to Enroll

Program staff need to inform and must confirm participants are enrolled in school within 90 days of the approval of their ITA. (See - Approval of an ITA request). It is recommended for participants who need to attend basic skills or prerequisite classes that their ITA is not finalized for approval until they are ready to begin college level classes.

Modifying an ITA

Program staff may approve a change of the participant's occupational goal to a related occupational goal when a participant decides after attending one quarter of school (maximum of fifteen (15) quarter credits) the occupation chosen is not suitable for the participant.

- This type of modification does not require waiver approval.

- Participants who decide to change their program of study must submit a request to the program operator for approval.

- There is no limit set on the number of times an ITA occupational goal may be modified; however, modification does not extend the limit of six (6) quarters of training.

A participant requesting a second ITA, regardless of whether or not the first training was completed, must complete the ITA request form and any career exploration activities deemed necessary by WIOA program staff.

In addition, the participant will need to write a statement explaining why they need additional training.

Program staff must submit these along with a waiver to an authorized signatory.

Using Purchase Orders

After a participant has approval for an ITA, WIOA program staff may write a purchase order to the training institution for tuition. Program staff must follow their own organization's procedure for obligating and de-obligating funds.

Coordination of WIOA Training Funds and other Federal Assistance

Program operators are to consider other sources of funding for training (excluding loans) to pay for training costs so that WIOA funds are used to supplement but not supplant other sources.

An exception to this is educational funding for Veterans. According to TEGL 10-09, the GI Bill and other education and training benefits administered by the Department of Veterans Affairs are not required to be coordinated with WIOA training (i.e., veterans and eligible spouses cannot be required to exhaust their VA benefits prior to gaining access to WIOA Training).

Participants are required to demonstrate satisfactory progress in training, except for good cause, to access payments through their ITAs. "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:

- Illness, injury or disability of the participant or a member of the participant's immediate family;

- Severe weather conditions or natural disaster precluding safe travel;

- Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant;

- Acting on advice received from an authority, such as the training provider, instructor, or case manager;

- Training is delayed or cancelled;

- Accepting stop-gap employment with hours or other work conditions that conflict with the training; or

- Accepting goal-related employment prior to completion of training.

Detailed Procedures

WIOA Program Operators - Staff Responsibilities

Program staff must first assess an individual's situation to determine whether or not training is needed for the individual to obtain employment that would provide a self-sufficient wage. An individual may be eligible for WIOA funded youth program services; however, training is not an entitlement and must be necessary.

The assessment should provide information for staff to determine:

- If the individual already has marketable skills for an occupation that will provide a self-sufficient wage; and for which there are job openings.

- If On-The-Job training would be more appropriate for the individual.

- If short-term training would be appropriate. Short-term and low-cost training lasting less than one week or at a cost of $600 or less, does not require an ITA.

- Short-term, intensive training is covered in WA State Policy #5601

  If the participant is already in training that is being paid for by other another program(s):

- Determine if the training is appropriate for the individual (based upon career exploration activities). Even if the WIOA program is not paying for tuition/fees, the program must be able to justify supporting the training decision before providing supportive and other services.

- If the training is appropriate, coordinate funding and services with the other program(s).

- No ITA Request is required unless WIOA funding will be used for tuition/fees since books and supplies are not included in the ITA award. In some cases, the original plan for the participant does not include the need for WIOA funding to pay for tuition/fees. If at a later date there is a need for WIOA fund, an ITA must be completed. A program operator could require a participant to complete the ITA assignments in case this does happen even though their tuition is to be paid by another program.

After determining that the individual may need training, provide the individual with the ITA Request Form and an orientation. The program operator should provide directions for completing the form; explain the career exploration assignments and the participant responsibilities. The ITA Request Form is the only PacMtn form that is required. Forms from other programs, computer research, etc. may be used in the participant file to document that the career exploration assignments have been completed. For example, a copy of a comprehensive assessment the individual has already taken is acceptable along with forms used by other programs (such as Trade Act) or forms created by the WIOA program operator. A new comprehensive assessment is require if the participant has changed their original course of study and a new assessment has not been completed.

For some of the career exploration assignments, it may be appropriate for the WIOA Staff to provide information to the participant in cases such as:

- When there are only a few employers in the area that hire for an occupation and it would burden those employers to keep having participants ask for informational interviews.

- If local trends in the labor market are changing quickly and/or the information found on-line is already out of date.

The WIOA Staff Person must review the completed ITA request to make sure that:

- The form is complete and the participant has provided documentation showing they have satisfactorily completed career exploration and have obtained sufficient information to make an informed decision.

- The participant has provided a clear justification/reasoning for their choice of training/occupation.

- If the request is not complete and/or the participant has not satisfactorily documented that they have acquired all of the information they need to make an informed career/training choice, guidance should be provided to assist the participant in acquiring the information they need.

- The youth program operator must maintain regular contact with each ITA participant, preferably monthly but no less than quarterly.

- If a participant is having difficulty in training, the youth program operator should either have the participant contact the training provider for tutoring and/or other services that may be available or contact the training provider for the participant.

- If a participant does not achieve satisfactory progress in a school term, the program operator may fund the next term based upon the participant's extenuating circumstances with the reason documented in the participant file. If the participant does not achieve satisfactory performance in the subsequent school term, the program operator must terminate ITA funding.

Participant Responsibilities

An individual must be actively enrolled in the WIOA funded youth program to be awarded an ITA. An individual who is interested in receiving WIOA funded training could inquire about the process to be awarded an ITA before actually being enrolled in a program; however, s/he must understand the enrollment requirements.

A participant must complete career exploration assignments for the purpose of gathering sufficient information for him/her to make an informed decision in choosing occupational training that they will be likely to complete successfully and in which they will be likely to find employment. For that purpose, the ITA Request contains career exploration assignments that include:

1. Comprehensive Assessment
2. Exploring occupations including Labor Market Research
3. Research of Training Providers
4. Informational Interviews with employers

- The participant must attend school full-time (see exceptions), including summer sessions.

- The participant must enroll in classes within 90 days from the approval of the ITA. Enrollment includes: a) pre-registered for classes/on a waiting list of an approved training; b) have a start date that is not more than one quarter or term away; c) are taking required pre-vocational classes.

- The participant must attain satisfactory performance which is generally considered to be maintaining a grade of a "2.0" or a "C" or better. The participant must provide the youth program operator with transcripts for each school term or a summary of progress from a training provider that does not use letter or number grades. A participant who does not achieve satisfactory performance for two consecutive school terms (quarter or semester) will forfeit further ITA funding.

- The participant must maintain regular contact with the youth program operator.

- The frequency of contact needed should be determined in consultation with the program operator (generally: monthly but no less than quarterly). Contact information must be kept up to date.

- If a participant is having difficulty in training, they must inform the youth program operator; and are responsible to set up and participate in tutoring or other services that may assist them.

- Participants who are receiving services and funding from other programs such as federal or state financial aid, worker retraining, TAA/NAFTA, DVR, etc., must remain in good standing with those programs. Failure to do so could result in the forfeiture of continuing ITA funding.

- Participants must be willing to apply for federal or other financial aid through the school/training provider each year. A copy of the award or denial notification must be placed in the file.

Note: WIOA programs cannot require participants to take out loans for school; however participants do have the right to take out a loan on their own accord.

Approval of an ITA Request

An ITA Request will be approved or denied based upon the following criteria:

- The ITA Request form is complete.

- The participant's justification for choosing the program of training and occupational goal is reasonable and appropriate (based upon comprehensive assessment).

- The occupation is in Demand (copy from Demand /Decline List)

- The training program & provider are on the Eligible Training Provider List.

- Upon completion of the training, the participant will be qualified for an occupation that can provide a self-sufficient wage.

- The participant also agrees to:

- Attend school full-time. (see exceptions)

- Attend summer sessions when required classes are available.

- Enroll in classes within 90 days from the approval of the ITA.

- Enrollment includes:

  - pre-registered for classes/on a waiting list of an approved training
  - have a start date that is not more than one quarter or term away
  - are taking required pre-vocational classes

- Maintain satisfactory progress (2.0 or better).

- Maintain regular contact with the WIOA program and notify the program of any issues affecting their ability to finish the training program.

- There is a clear and realistic plan to pay for the participant's cost for training and other expenses. This may include funds from other sources of funding (Pell Grants, Workforce funds, WorkFirst, TAA, L&I, DVR, participant's wages if working).

Note: Participants cannot be required to take out loans for school; however they do have the right to get a school loan as long as it is their choice.

Other Considerations

Employed Participants:

- A currently employed participant could request an ITA for training that:

  - Is related to their current employment and will help them to advance on the job or to retain their job,

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> ➤ Will qualify him/her for an occupation that could provide a self-sufficient wage (if s/he is not currently earning a self-sufficient wage)

Distance Learning:

- Distance learning programs in Washington State are listed on the Eligible Training Provider List. www.careerbridge.wa.gov/

- For distance learning programs outside of Washington State, program operators must ensure that the program of training is on that state's list. To find Eligible Training Providers in other states go to: http://www.careeronestop.org/WIOAProviderSearch.asp

- Distance learning is not for everyone so it would be important for a WIOA program operator to interview a participant to determine if distance learning is appropriate for him or her. The following factors, at a minimum, should be discussed with the participant:

  > ➤ Why does the participant want to take classes on-line instead of attending regular classes on campus? Do they have issues such as transportation, child care, work or school scheduling problems?

  > ➤ Is the participant a self-starter and disciplined enough to do the work on their own? Can they give you any examples that demonstrate this?

  > ➤ Do they have a computer that meets the requirements of the distance learning course?

  > ➤ Do they have high speed internet service for the computer? Is there a chance that they will not be able to continue the service?

Training Provided Outside of Washington or the PacMtn five county area
WIOA program operators should consider their ability to provide on-going services to participants who request training that takes place outside of the PacMtn five-county area or outside of Washington State.

Persons with Disabilities
Participants with a documented disability, physical or sensory, may have the duration of their training extended beyond the time or financial limits and may attend school part time if needed to accommodate their disability. The disability must be documented by a licensed professional and information regarding the disability must be kept in the participant's locked file. A waiver must be approved by the Associate Director of Workforce Services

Fiscal Issues:

- When calculating the amount of the ITA award, include only the cost for tuition and fees.

- Pre-vocational classes are not required to be made part of the ITA award and therefore may be considered an intensive service.

- Other costs of attending school such as: transportation, books, supplies, parking fees and living expenses are not included in the amount of the ITA award. Program operators may choose to include books, supplies and parking in their program budget as training costs.

- A participant shall not be required to take out a loan to pay for their training costs. However, a participant may choose to take out a loan on their own to help them get through their training.

- If a participant wants to attend a private school that charges more than a comparable program at a state funded school, the ITA award should only include funding equal to the cost of training at the state funded school. The participant must take this expense into consideration in planning their training costs and document in their ITA request how these expenses will be paid for.

- Payments for tuition and fees are to be made incrementally based upon the participant maintaining satisfactory progress. An exception is made when the training provider requires that all of their students pay tuition according to the school's established policy.

- Program operators will use their established fiscal method (PO or Voucher) to make payments directly to the training provider.

- Participants who receive financial aid such as the PELL Grant or a State Needs Grant are expected to use these funds for tuition, fees and books. However, program operators may pay for some or all of these costs (as part of an ITA) if a participant's financial situation warrants this support. Justification which takes into account the participant's objective assessment should be documented in the file. Program operators may choose to pay tuition and fees of participants receiving financial aid as a strategy to conserve tax dollars by saving staff time in preparing Support Service Request forms and the fiscal processing required to provide supportive services.

- Participants must be informed that program operators obligate funds program year to program year. ITA funds awarded to a participant are contingent upon the federal funds provided to the WIOA funded program. Participants will be informed as soon as possible if a WIOA program will have insufficient funds to continue payments for tuition and fees.

Changes in the Participants ITA Training Program:

- The program operator funding the ITA may approve a change of the participant's occupational goal to a related occupational goal when a participant decides after attending one quarter of school (maximum of 15 quarter credits) that the occupation he/she chose is not right for him/her. An example would be a participant whose goal was certified nursing assistant but after attending one quarter decides that medical transcription is a better fit. This type of modification to a participant's program does not require waiver approval. There has been no limit set on the number of times an ITA occupational goal can be modified; however, this does not extend the limit of 6 quarters of training.

- Participants who wish to change their program of study should submit a request to the program operator. If approved by the program operator, it must be documented in the file and in the SKIES Service Plan in the justification text box.

- A participant who requests a second ITA, regardless of whether or not they completed the first training, must complete the ITA Request Form and any career exploration activities deemed necessary by the program operator. In addition, the participant will need to write a statement explaining why they need additional training. The WIOA program operator must submit these along with a waiver to the Associate Director of Workforce Services. A WIOA program operator may choose to write an internal policy that specifies if there is a specific amount of time that must pass before the program will accept a request for additional training through an ITA.

Exceptions

A Customized Training Contract for services may be used instead of ITA's only when:

- Pre-approval has been granted in writing by PacMtn's Associate Director of Workforce Services.

- Used to pay for group training, in lieu of individual training accounts, when the training is otherwise approvable under federal and state law and policy, and only if the individual's rights for consumer choice are not superseded.

- When a lack of training capacity limits customer choice and customers are not able to enroll in training of their choice on a timely basis or are otherwise required to choose another training program. This could occur because there are an insufficient number of Eligible Training Providers (ETPs) locally to fully utilize Individual Training Accounts (ITAs).

- When it is efficient to contract with an effective local community-based organization (CBO) or other private organization training program to do the training.

- When it would facilitate the training of multiple individuals in high-demand occupations.

  Customized Training Contracts must:

- Be competitively bid in accordance with applicable federal and state laws, rules and policies.

- Directly link to an in-demand industry sector or occupation, or a sector with high potential for sustained demand or growth, either locally or where participants are willing to relocate.

Customized training contracts and individual training accounts can be combined to provide training services, including for allowing individuals with ITAs to obtain contracted training services.

Waivers:

Youth program operators must submit a waiver request to the PacMtn Associate Director of Workforce Services for any of the following:

- A request for a participant to take a program of training for an occupation that does not show as in demand on the Demand/Decline List.

- This will only be approved in the case where an employer provides a written statement indicating that they will hire the participant during or after the training period.

- Upon approval of an exception to the Demand/Decline List by the Associate Director of Workforce Services

- A request to pay for tuition in excess of the $7,000 limit.

- A request to extend the maximum of six of quarters to complete training (except were a disability is documented and the additional quarters are an accommodation).

Required Forms

Youth program operators shall use the PacMtn ITA Request Form, Attachment A, to document the approval of ITA awards.

Program operators may choose the documentation used for the career exploration activities of an ITA Request. Forms from other programs such as Trade Act or data collected from the Internet may be used.

Priority of Service

The Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) No. 10-09 provides information regarding the implementation of Priority of Service for Veterans (effective 11/7/02) and Eligible Spouses in all Qualified Job Training Programs funded in whole or in part by the U.S. DOL at: http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816

Typically, in the PMWDC dislocated worker program, enrollment is on-going and occurs on a "first come, first served" basis without any need to maintain a waiting list. However, if a waiting list does occur, priority of service for Veterans and Eligible Spouses must be given before serving non-covered persons.

Priority of Service is not intended to allow a Veteran or Eligible Spouse who is identified subsequently to "bump" the non-covered person who is enrolled and is already approved for or in a training program. If there is a waiting list of applicants to be enrolled, Veteran Priority applies. If enrolled participants are on a waiting list for the formation of a training class, Priority of Service for Veterans and Eligible Spouses applies.

WIT System Data Entry Requirements *(WorkSource Integrated Technology System)*
For all applicable and required WIOA and or Wagner-Peyser applicant or participant Career, Training or Follow-Up Service data entry requirements, to include but not be limited to the following:

- Applicant or Participant Registrations,
- Program Enrollments,
- Eligibility Determinations (as detailed in policy #5000),
- IEPs,
- ITA's and Training Program Enrollments/Service Delivery,
- Training paid by others,
- Training/Program Completions
- Support Services,
- Exits,
- Follow-Up Services, and
- Case Note Entries

Staff must follow all data requirements as necessary per Policy 1020 - Data Integrity and Performance Reporting Requirements and Handbook, as applicable for entry within the WIT System

Please follow all current and future Workforce Integrated Technology (WIT), System guidance, training, instructional materials and direct departmental or program supervisor instruction and policies developed.

If applicant or participant information is already entered in the WIT System, staff must verify that the information is current and/or make updates. If required by program, print out the applicable or necessary document, obtain signatures and place in the hard copy file. Please note all system data updates or changes in case note.

To deliver Career or Training Services, the program staff person is required to enter participant and

program specific data which will create an Individual Employment Plan/Service Plan.

Data Validation Note:
The date of dislocation entered must be documented in the file with:

- Verification from employer
- Rapid Response list
- Notice of Layoff
- Public announcement with UI cross-match
- Self-attestation for transitioning military by the Army Career Alumni Program (ACAP)
- Self-certification from military applicant

Applicants who identify them self as a veteran must have a copy of their DD214 in their participant file. The dislocation date must have the month, day and year.

Any discrepancies arising between PacMtn policy and or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. PacMtn policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will PacMtn policy and or procedures not meet minimum federal and state policy.

References

State Policy 5619   20 CFR 680.310(d)
State Policy 5611   20 CFR 680.320(a)
State Policy 5601   20 CFR 680.320(a)(4) Training and Employment Guidance Letter 10-09
WIOA Sections 134(d)(3)(C) and 134(d)(3)(C)(vi) Policy # 5130 – On-the-Job Training

DATE APPROVED: June 4, 2016

Individual Training Account (ITA) Request Form

Name: _____ **Date:** _____

Address: _____ **City/Zip:** _____

Phone #: _____ **Email:** _____

COUNTY: Grays Harbor _or_ Pacific _or_ Lewis _or_ Mason _or_ Thurston

Who is your contact person at the WIOA program/who gave you this form? _____

As you complete Career Exploration Activities, check off below and write in attachment numbers:

❑   1. I received ITA Orientation on: Date: _____

❑   2. Labor market research – Attachment #: _____

❑   3. Employer interview summaries – Attachment #: _____

❑   4. Training provider research – Attachment #: _____

❑   5. Vocational assessment (aptitude, skills, interests) – Attachment #: _____

After completing Career Exploration, indicate your choice for the following:

Training program: _____

Degree: _____ Start Date: _____ End Date: _____

Name of Eligible Training Provider/College/University: _____

Training Location: _____

By signing below, I affirm that the information I am providing is accurate to the best of my knowledge:

_____   _____
Requestor's signature   Date Submitted

ITA AWARD INFORMATION

❑   **The ITA Request is Approved**   **WIA STAFF NAME:** _____

❑   **The ITA Request is Denied.**

COMMENTS: