



Individual Training Account (ITA) Policy For Adults & Dislocated Workers & TAA

As approved by the CSS WFNY Board: Full Board August 17, 2017

As amended by the CSS WFNY Board: Full Board November 17, 2017

Policy: CSSWFNY policy for Individual Training Accounts (ITA) in compliance with Technical Advisory #09-02.1 is as follows:

1) Definition of Individual Training Account

- a. ITA is one strategy for individuals to obtain training and/or education funded through WIOA. The term “individual training account” means **financial assistance paid to training providers to assist individuals determined to be in need of classroom training or online learning in order to gain skills sets that result in employment opportunities for local demand occupations.**

The training should:

- i. Provide knowledge or skills essential to adequately perform a job in the career discussed in the trainee’s individual employment plan; and
 - ii. Be within training limits established per the Local Demand Occupation list with priority be given to individuals who are deemed most in need
 - iii. ITA caps are established according the training levels on the Local Demand Occupation List.
- b. Identification of a training program to remediate a skills gap identified through comprehensive assessment is sufficient justification for issuance of an ITA for the training program. *(TA #09-2.1)*

2) ITA Policies

- a. CSS Workforce’s policy in regards to individual trainings are as follows:
 - i. ITA trainings must be established only with a training provider who is listed on the ETPL as approved for this LWDA, unless the training is funded with TAA.
 - ii. Trainings must not be established with a training provider who has received payment for prior trainings, if the training provider has exhibited a pattern of failing to provide ITA participants necessary skills required to obtain employment.
 - iii. Trainings must be limited to the required time necessary for a participant to become proficient in the occupation for which the training is being provided. While establishing the length of training necessary, consideration shall be given to the skills requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participants individual employment plan.
 - iv. Trainings may be established for eligible participants when:
 - ✓ The participant is unable to obtain grant assistance from other sources to pay the cost of their training
 - ✓ The participant requires assistance beyond that available under grant assistance from other sources to pay the costs of training.

- a. A participant may enroll in an ITA while his/her application for financial aid is pending if the one-stop operator has communicated with the training provider and the participant regarding the allocation of the financial aid if it is awarded. In that case, the training provider must reimburse CSS WFNY the funds used to underwrite the training for the amount the financial aid covers. Reimbursement is not required from the portion of financial aid assistance disbursed to the participant for education-related expenses.
- b. TAA participants- **100% of the total cost of training must be paid for by TRADE ACT funds, WIOA funds or other public or private funds that do not require reimbursement. The source of funds for an approved training plan must be documented on the Request for TAA Funds for Training/Training Plan Details form. A training plan that requires the trade-affected worker to pay any portion of the cost of training cannot be approved. This prohibition on the use of personal funds includes, but is not limited to student loans; however, student loans can be used for living expenses. In addition, the trade-affected worker cannot borrow funds from a relative or friend to cover any portion of the training costs.**
 - ✓ CSS WFNY shall only pay for training services once all other funding sources have been exhausted.
- v. Trainings are approved by a committee of business, education and training professionals by majority. Funding approval authority is contingent upon the availability of funds in the local area.

3) ITA Outreach

- a. ITA outreach may be done directly or indirectly to individuals. Outreach includes, but is not limited to: face-to-face contacts, mail outs, involvement with a Chamber of Commerce, press release, networking with other agencies and speaking to civic organizations.

4) Training Providers

- a. The workforce development system established under WIOA emphasizes informed consumer choice, job-driven training, provider performance and continuous improvement.
- b. Documentation must be provided in the participants file, verifying that the trainee selected the training provider. *WIOA § 680.310 (c), WIOA § 680.340(a)*
- c. Training providers, except for TAA customers, must be on the State Eligible Training Providers List (ETPL). *WIOA § 680.410(b)*

5) ITA Eligibility (*per §680.210*)

- a. Only those individuals who meet the eligibility requirements for individualized career services, who have been ***interviewed, received an evaluation or an assessment and career planning Individual Employment Plan (IEP)*** and are determined to be:
 - i. 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; *WIOA § 680.210 (a)(1) and are:*
 - ii. In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; *WIOA § 680.210 (a)(2) and*
 - iii. Have the skills and qualifications to participate successfully in training services; *WIOA § 680.210 (a)(3)*

Are Eligible to utilize Individual Training Account Funding

- b. Participant must select a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individual is willing to commute or relocate; refer to the **Local Demand Occupation List** with training funding levels. *WIOA § 680.210(3)(b)*.
- c. Are unable to obtain grant assistance from other sources to pay the costs of such training, including such resources as State – funded training funds, Trade Adjustment Assistance, and Federal Pell Grants, or require WIOA assistance in addition to other sources of grant assistance. (**provisions relating to fund coordination are found at *WIOA § 680.230 and WIOA sec. 134(c)(3)(B)***) and
- d. If training services are provided through the adult funding stream, are determined eligible in accordance with the State and local priority system in effect for adults under *WIOA sec. 134 and WIOA § 680.600*.

6) Training Determination

- a. Staff who have responsibility for providing comprehensive assessment services also have the authority to develop and submit an ITA for funding approval.
- b. Information regarding the training must be provided utilizing the SENSE model: Situation, Evaluation, Next Steps, Sufficient Information, Employment-Related Information Only. *TA #11-12.2*
- c. The case file first must contain a determination of need for training as determined through the Interview, Evaluation, Assessment, Career Planning or Other Approved Methodology. *WIOA § 680.210(a); 680.220 (a)*
- d. 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, the approval authority must document the circumstances that justified its determination to provide training without first providing an interview, evaluation, assessment or career planning (IEP). *WIOA § 680.220 (b)*

7) Supportive Services

- a. All ITA recipients may be eligible for Supportive Services determined by the training level. Please refer to the Supportive Services Policy for limitations.

8) Case Management Follow Up

- a. Case Management may extend one year following training completion. Follow up during training, at the end of training, as well as job placement services are necessary to provide documentation of the training outcome. *WIOA § 678.430 (c), §678.430 (a)*

9) Monitoring

Monitoring shall include:

- i. oversight of the participant training file and OSOS record; **and**
- ii. corresponding training provider invoices to ensure validity and propriety of the reimbursement amounts claimed, and that the training is delivered.
 - ✓ Invoices shall reflect the total cost of training less any other funding sources used if applicable.