

Workforce Development Council of Seattle-King County

Policy #03-2000

~ Individual Training Account (ITA) ~

DRAFT FINAL

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Committee: ECC

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Purpose

This policy covers eligibility for Individual Training Account (ITA) expenses, the manner in which these funds are allocated, and limits on the amount of assistance available for individuals.

This policy applies to Workforce Investment Act funded programs.

Background

Under the Workforce Investment Act (WIA), Title I-B training services for registered customers are provided through Individual Training Accounts (ITAs). [*Reference – PL 105-220 Section 134 (d) (4) (G)*]

The ITA, as described in the WIA, is established on behalf of a registered WIA Title I-B adult, dislocated worker, or older youth. The customer uses the funds to purchase training services from an eligible provider he or she selects in consultation with an employment counselor. Payments from ITAs may be made in a variety of ways, including vouchers, the electronic transfer of funds through financial institutions, or other appropriate methods. Payments may also be made incrementally, through payment of a portion of the costs at different points in the training course.

Customers receiving training under this approach will receive the information they need (e.g., skills assessment, labor market conditions and trends, training provider performance) to make an informed choice about their own employment future and the training they need to support this decision. Limitations established by WDC policies must not undermine, but maximize customer choice in the selection of a training course toward an occupation in demand and an eligible training provider.

At the same time, WIA regulations allow the state or Workforce Development Councils to impose limits on the dollar amount and/or duration of ITAs. [Reference: 20 CFR Part 652, 663.420 (a) and (b)]

- There may be a limit for an individual customer that is based on the needs identified in the individual employment plan; or
- There may be a policy decision by the WDC to establish a range of amounts and/or a maximum amount applicable to all ITAs.

Policy

Based on individual assessment and funds available, an ITA may be awarded to eligible customers. It is the intent of the WDC to primarily use ITA dollars to help customers make wage progression and gain a livable wage job. Since wage progression is on a longer-term basis, the customer can have up to two years to complete the ITA. The individual must be enrolled in approved training within 30 days of designation of the ITA award.

Priority must be given to enrolled eligible veterans and their spouses under the Jobs for Veterans Act (see definitions section). If program and service resources are limited, then the veteran or spouse is given access instead of others. NOTE: This does not mean that the veteran or spouse is given “bumping rights” over others who are already receiving an ITA award.

The average amount of the ITA will be \$3,500 with a maximum of \$7,000 over the lifetime of the award. Awards exceeding the \$7,000 specified in the policy can be awarded to a customer only if recommended by the employment counselor and approved by the WIA provider’s management. The maximum period to use the ITA award is two years. In order to have an exception approved, justification must be provided which supports that additional dollars or duration for training is needed in order for this individual to attain or retain livable wage employment or to make significant wage progression.

When awarding an ITA, the employment counselor must consider how to combine the ITA with other appropriate and applicable resources that may be available first, such as Pell Grants, tuition assistance/exemption, employer training subsidies, apprenticeship dollars, or ITA dollars from other counties. The final ITA amount will be adjusted to reflect the financial assistance received from other sources in order to achieve the goals of the Individual Career Plan. The ITA award will be paid incrementally on a quarterly basis. The ITA covers books, fees, and other educational materials or supplies in addition to tuition.

Consideration must also be given to labor market demand in the local area. ITAs may only be issued for occupations that are in demand. A list of these occupations can be found in the Qualifying Occupations List published by Employment Security Department’s Labor Market Economic Analysis unit and made available on WDC’s website. In order to have an exception approved, evidence must exist that the occupation for which the customer is

awarded an ITA is in sufficient demand and that the individual will make significant wage progression to warrant the investment of resources into the training activities.

When a program of training is removed from the state Eligible Training Provider (ETP) list, WIA participants currently enrolled in the program with the support of an ITA may be allowed to complete their training. 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 ETP list.

An ITA can only be issued for vocational training courses offered by an eligible training provider that meets the criteria established by the Workforce Board and that is published on the statewide Eligible Training Providers List. The WIA providers shall manage ITA issuance, including ITA related document that is given to the customers. The WIA providers track expenditures of all resources paying for the individual's training, including the WIA title I funds of the ITA.

Procedures

ITAs will be issued to WIA-registered customers within the following parameters:

1. The individual must have received at least one core service;
2. The individual must have received at least one intensive service;
3. The individual must have completed an Individual Career Plan;
4. As a result of standardized assessment process, the individual must have been determined to be unable to obtain or retain livable wage employment through core and intensive services. The progression to training services is based on appropriateness of services rather than the length of time for the individual to make wage progression or obtain or retain family self-sufficient wage employment;
5. The individual must have the skills and qualifications to successfully complete the selected training program (limited English proficiency should not be a barrier, but supplemental intensive language training should be given);
6. The individual must have applied, with support from the employment counselor, for appropriate and applicable sources of financial aid such as Pell Grant, tuition assistance/exemption, employer/union subsidies, apprenticeship dollars, or ITA dollars from another county if the individual resides in another county. The individual must have completed a training research proposal.
7. Although WIA emphasizes universal access, unless he or she is a Dislocated Worker, priority usage of the limited ITA dollars must be given to individuals who belong to a WDC priority group as defined in the local unified plan, unless the Secretary of Labor determines funds are not limited. The WDC's priority groups are:
 - a) Federal – veterans, public assistance recipients and low income
 - b) State – Less than 175% of poverty
 - c) Local – At or above 175% of poverty plus one barrier to employment;
8. The ITA amounts can only pay up to the cost of State of Washington residency tuition;
9. The individual is training for an occupation in demand in King County's labor market.

In order to ensure that the individual fully utilizes the ITA, he or she must attend a session to understand how the local system operates, the dollar limit of the award, the customer's responsibilities, and the choices that are available to him or her. The WIA providers will make accessible to customers the Eligible Training Providers List.

The customer must be enrolled in approved training within 30 days of designation of the ITA award. The customer would be considered enrolled in training if he or she:

1. Is pre-registered for classes or on waiting list of an approved training provider;
2. Has a starting date of training that is not more than one quarter or term away.

Exceptions to the rules are:

1. Class cancellation;
2. Health problems (with doctor's letter as proof);
3. Demonstrated childcare barriers;
4. Job related factors (with employer's letter as proof).

The customer must consult with the employment counselor, at a minimum, at the end of each quarter during the lifetime of the training plan to ensure that the customer is making satisfactory progress in training. The training provider will certify the customer's satisfactory progress with the signature of the registrar or an equivalent person designated by the training institution. If the customer is not making satisfactory progress each quarter, the employment counselor may either renegotiate a new ITA or de-obligate ITA funds. Satisfactory progress includes: passing grades in all classes that will lead to a certificate. Dropped or incomplete classes may result in the de-obligation of ITA funds.

Exceptions to policy

Contracts for services may be used instead of ITAs only when one of the following three exceptions applies: [Reference – PL 10-220 Section 134 (d) (4) (G) (ii)]

1. When the services provided are on-the-job training (OJT) or customized training;
2. When the WDC determines that there are an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs. The WDC will research advertised offerings, projected student enrollments and enrollment capabilities of training programs for the following quarter to determine if training slots are full and consequently ITAs are inadequate for WIA participants to pursue high demand training of their choice;
3. When the WDC determines that there is a training service program of demonstrated effectiveness offered in the area by a community-based organization (CBO) or another private organization to serve special customer populations that face multiple barriers to employment. Special populations that face multiple barriers to employment are populations of low-income individuals that are included in one or more of the categories noted below:
 - Individuals with substantial language or cultural barriers;

- Ex-offenders;
- Homeless individuals; and
- Other hard-to-serve populations.

Definitions

Veteran means a person who was in active military service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service also includes full-time duty in the National Guard or a Reserve component, other than full time duty for training purposes.

Eligible Spouse as defined in section 2(a) of JVA (38 U.S. C. 4215(a)) means the spouse of any of the following:

- (1) Any veteran who died of a service-connected disability;
- (2) Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (i) Missing in action;(ii)captured in line of duty by a hostile force; or (iii) forcibly detained or interned in line of duty by a foreign government or power;
- (3) Any veteran who has a total disability resulting from a service connected disability, as evaluated by the Department of Veterans Affairs;
- (4) Any veteran who died while a disability, as indicated in paragraph (3) of this section, was in existence.