Workforce Innovation and Opportunity Act Policies and Procedures
POLICY #W408, R2   **Effective Date:** December 2022

1. Background

Training services under the Workforce Innovation and Opportunity Act (WIOA) typically must be provided by training providers who receive payment for their services through an Individual Training Account (ITA). The ITA is a payment agreement established on behalf of a WIOA participant with a training provider. WIOA title I participants purchase training services from State eligible training providers they select in consultation with the career planner, which includes discussion of program quality and performance information on the available eligible training providers.

2. Definitions

- **Brokering agency:** an entity designated by the Spokane Workforce Council (SWC) to be responsible for authorizing ITA awards and providing ITA payments.

- **Individual Training Account (ITA):** a payment agreement established on behalf of an individual with a training provider for the provision of a training program.

- **Service provider:** a provider of workforce development services in Spokane County, such as the local one-stop center or other entity designated by the Spokane Workforce Council (SWC), that is responsible for providing services to WIOA title I adult, dislocated worker, and youth participants.

- **Training program:** a training program is one or more courses or classes, or a structured regimen, which leads to at least one of the following:
    - An industry-recognized certificate or certification;
    - A certificate of completion of a registered apprenticeship;
    - A license recognized by the State involved or the Federal government;
    - An associate or baccalaureate degree;
    - A secondary school diploma or its equivalent;
    - Employment; or
    - Measurable skill gains toward one of the outcomes listed above.

- **Training provider:** an institution of higher education, an organization that carries out a registered apprenticeship program, or other public or private provider of training programs.

- **WorkSource System Tools (WST):** a management information system that workforce development organizations in Washington State use to collect data and manage themselves efficiently and effectively.

3. Policy

Providing training services to individuals through an ITA must comply with each of the criteria listed below:

a. **Types of training services:** Any training services described in SWC Policy WS816 R3 – Attachment C – WorkSource Spokane Services Catalog may be purchased with an ITA for adult and dislocated worker participants, with the following exceptions: customized training, increased capacity training, incumbent worker training, and on-the-job training. Out-of-school youth may also purchase occupational skills training (program element #4) with an ITA, as listed in SWC Policy WS816 R3 – Attachment C – Spokane Next Generation Zone Services Catalog. In-school youth are not eligible to receive an ITA.

b. **Consumer choice requirements –** Training services funded through an ITA must be provided in a manner that maximizes both regional labor market information and informed consumer choice in selecting an eligible training program to deliver the services. To ensure individuals receive this information, service providers must make available the Washington State list of eligible training providers (ETPL) and Washington State

labor market information or the ETPL and labor market information of another state in which the individual is willing to commute or relocate.

    c. Eligibility to receive WIOA title I training services – ITAs may only be provided to an individual who is determined eligible for training services as defined in [Section 1.3 – Training Services or Section 1.5 – Youth Services in SWC Policy WS816 R3 – Attachment A – Services and Program Eligibility Handbook](#).

    d. Criteria to receive an individual training account – Below are specific requirements that must be met in order for an individual to receive an ITA:

        i. **Eligible Training Provider List (ETPL):** Each state maintains a list of training providers who provide training programs eligible to receive funds provided through an ITA, known as an ETPL. An individual must select a training program from this list to receive an ITA.

            Note: When a training program is removed from a state's ETPL while individuals are still participating in that program, individuals are allowed to complete their training as identified in their ITA at the time the program is removed. ITAs cannot be modified or extended (see ITA modifications below) for individuals beyond the current plan as it relates to a training program that is no longer on the ETPL in question.

        ii. **Postsecondary credential:** the training program must lead to a recognized postsecondary credential. A postsecondary credential includes an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree. To be considered a recognized postsecondary credential, the credential must:

            1. Be awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills

            2. Be necessary to obtain employment or advance within an industry/occupation.

            3. Recognize technical or industry/occupational skills specific to an industry or occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

        iii. **In-demand priority:** using labor market information, the training program must be directly linked to employment opportunities in the area in which the individual resides or in an area the individual is willing to commute or relocate. Sources of labor market information include but are not limited to: job postings, economic statistics, state demand/decline lists (showing balanced or in-demand status), news articles, and state or US labor statistic agencies, such as ESD or the US Bureau of Labor Statistics (BLS).

            Note: registered apprenticeship programs are considered to be directly linked to employment opportunities even if the local labor market information indicates "not in-demand" the occupation for which the individual is apprenticed.

        iv. **Training start date and duration:** training programs must be expected to begin within 60 days of the establishment of an ITA, and training programs must have an expected completion date within 2½ years of the training's start date. Exceptions to these limits may be considered on a case-by-case basis by the service provider.

    e. Coordination of WIOA training funds and other grant assistance – ITA funding is limited to participants who require assistance beyond that available under grant assistance from other sources to pay the costs of such training. The following criteria must be considered when funding an ITA:

        i. Service providers must coordinate and make funding arrangements for all training funds an individual is eligible for within the WorkSource Spokane one-stop center, the Next Generation Zone, one-stop partners, and other entities with available funding. Examples of other sources of funding include, but are not limited to: Temporary Assistance for Needy Families (TANF), state-funded training funds such as Worker Retraining or Trade Act, and Federal Pell Grants.

        ii. A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the one-stop center 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 one-stop center the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses.

iii. Department of Veterans Affairs benefits for education and training services are not included in the category of "other sources of training grants" and are not required to be coordinated with other available funding.

iv. Student loans, or loans of any kind, are not included in the category of "other sources of training grants" and are not required to be coordinated with other available funding.

f. **Limits to ITA funding amounts –**

i. The total amount of funding allowable through an ITA must be based on the full cost of training. The full cost of training may include any of the following costs: tuition, books, software, academic fees, educational testing and certification, and equipment and tools required by the training program. Prerequisite training or internships may also be included as long as they are required by the educational institution to participate in the training program. Fines and penalties, such as late finance charges and interest payments, are not allowed.

ii. After considering funds from other sources, ITA funding may not exceed what is determined as the full cost of training.

iii. The SWC has established the maximum funding amount allowable for the WIOA title I portion of the ITA at $10,000. Note that this is a limit on ITA training funds only. Supportive services, work-based learning (such as an OJT), and other services funded with WIOA title I are not included in this limit.

g. **ITA awards and training payments –** After an individual chooses an approved training program and eligibility to receive the ITA has been determined, authorization and obligation of the ITA is to be completed. This is known as an ITA award. ITA awards and training payments against the ITA award are provided as follows:

i. The SWC has chosen to contract all ITA awards and funding payments through a brokering agency as identified through a competitive WIOA services RFP process and subsequently by subrecipient agreement. This brokering agency is responsible for authorizing and obligating all ITA awards. The brokering agency may not deny an ITA award or payment to an individual who has been determined eligible for an ITA by an authorized service provider unless funding is limited.

ii. Payments by this agency for training services funded through ITAs may be made in a variety of ways, including electronic funds transfer, vouchers, or other appropriate methods.

iii. ITA training payments may be used to pay for an entire training program at the beginning of the training or on an incremental basis.

iv. ITA training payments can be used to pay for any costs identified in the full cost of training.

h. **ITA modifications –** There are times when it is necessary to modify an ITA under certain circumstances. There are no limits to when an ITA may be modified or how often. An ITA should be modified when the original scope of the training, such as length of time, course requirements, or full cost of training, has changed. An ITA should not be modified if the individual's employment goal changes or if a different training provider or program is needed. These situations may impact the requirements of the ITA, so a new ITA should be written.

i. **Satisfactory progress –** Individuals must demonstrate satisfactory progress in their training program to receive continued funding for their ITA, except when good cause is established (defined below). The minimum amount of time an individual needs to participate to demonstrate satisfactory progress and the frequency at which this is repeated should be based on the length of the training program in question and circumstances of the individual. If an individual does not demonstrate satisfactory progress, and tuition and other initial costs are paid in full at the beginning of the training, the ITA cannot be modified to include additional expenses of any kind.

i. **Satisfactory progress** is defined as:
1. The individual has a grade point average that does not fall below 2.0;
2. The individual maintains a grade point average sufficient to graduate or receive a certificate or license;
3. The individual is completing sufficient credit hours to finish the training program; or
4. In cases where the training program is self-paced or ungraded, "satisfactory progress" is defined as participating in classes and passing certification examinations within a timeframe established and documented in the individual's file.

ii. **Good cause** is defined as:

1. Illness, injury, or disability of the individual or a member of the individual's immediate family;
2. Severe weather conditions or natural disaster precluding safe travel;
3. Destruction of the individual's school records due to a disaster or other catastrophe not caused by the individual;
4. Acting on advice received from an authority such as the training provider, the instructor, or an authorized career planner;
5. Training is canceled or delayed;
6. Accepting stop-gap employment with hours or other work conditions that conflict with the training; or
7. Accepting goal-related employment prior to completion of the training.

4. <u>Documentation and Data Entry Requirements</u>

a. **Full WIOA registration** – Full WIOA eligibility determination and registration is required to receive any WIOA-funded training service. If an individual is determined eligible for one or more title I programs, all relevant registration elements must be collected and entered into WST. Additionally, a training services assessment and any other relevant documentation must be collected and stored physically or electronically in the individual's file. Refer to [SWC Policy WS816 R3 – Attachment A – Program and Services Eligibility Policy Handbook](#), for more information on documenting eligibility and the need for training services.

b. **Training agreement –** A training agreement satisfying the documentation requirements of the ITA must contain the following and be stored physically or electronically in the individual's file:

   i. The type of training service being funded;

   ii. The training provider and training program;

   iii. A copy of the ETPL establishing that the training program is eligible to receive funds provided through an ITA and that it leads to a recognized postsecondary credential;

   iv. LMI demonstrating priority consideration for a training program directly linked to employment opportunities in the area in which the individual resides or in an area the individual is willing to commute or relocate.

   v. The full cost of the training;

   vi. The amount obligated for the ITA using title I funding and what expenditures will be covered by the ITA; if funding comes from more than one title I program, such as WIOA adult and WIOA dislocated worker, each program and the funding provided should be identified separately;

   vii. The estimated amount of other sources of funding used to support the ITA, such as TANF or Pell grants; and

   viii. The start date and estimated duration of the training program.

c. **Training progress and completion** – information showing the progress of the training and the outcome of the training once completed must be documented physically or electronically in the participant's file as follows:

   i. ITA payments made;

   ii. Documentation demonstrating satisfactory progress;

   iii. Any ITA modifications, if applicable; and

   iv. Once the training program has completed, documentation for the end date of the training, the outcome, and any postsecondary credentials earned.

d. **Service requirements** – information regarding the training service used must be entered into WST as follows:

   i. An appropriate qualifying service must be entered into WST to represent the training. Training services are described in [SWC Policy WS816 R3 – Attachment C](#). If funding is being provided by more than one Title I funding source, a service must be entered for each funding source as appropriate;

   ii. This service (or services) must document the start and estimated end date of the training as appropriate in WST. For a training program that has begun prior to enrollment in a program, the enrollment date of the respective program is used in place of the training start date. When the overall training program ends and a credential is obtained (if applicable), this is to be used as the end date of this service (or services);

1. If an individual completes a training program, but does not earn a credential within 90 days of the last training course, the service(s) in question should be closed using the completion date of the last training course, and the individual should either be put in a hold status or provided other case management services until the credential is earned;

iii. Case notes must be entered detailing the start of the training, progress during training at least once every thirty days, and the outcome of the training.

5. <u>Action Required</u>

Agencies responsible for managing training services, either as a brokering agency, a service provider, or both, are defined by subrecipient agreement with the SWC. Minimum requirements for these agencies are below:

a. Brokering Agencies: brokering agencies, as identified by subrecipient agreement, are required to:

    i. Maintain policies and procedures for the authorization and obligation of ITA awards and ITA payments;

    ii. Develop a method or methods with which ITA payments will be made, such as through electronic funds transfer or a voucher system; and

    iii. Coordinate ITA modifications and de-obligations with service providers.

b. Service Providers: service providers who determine eligibility for training services and ITAs, and refer to a brokering agency, as identified by subrecipient agreement, are required to:

    i. Maintain policies and procedures for determining training services eligibility and how the eligibility and requirements for ITAs will be documented;

    ii. Develop guidelines for career planners to monitor progress in a training program. At a minimum, progress must be documented quarterly to ensure satisfactory progression (defined above) or if necessary, to de-obligate an ITA award if the individual has left the training program prior to completion;

    iii. Coordinate ITA modifications and de-obligations with brokering agencies; and

    iv. Track all ITA expenditures in each individual's physical or electronic file.

6. <u>References</u>

- SWC Policy WS816, R3 – Eligibility Policy & Handbook
- ESD WIOA Policy 5601, R2 – Individual Training Accounts

7. <u>Supersedes</u>

- SWC Policy W408 R1
- SWC Policy W417

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