



TO: All Humboldt County Workforce Innovation and Opportunity Act (WIOA) Subrecipients and Service Providers

FROM: Humboldt County Workforce Development Board

EFFECTIVE: September 13, 2018

SUBJECT: Individual Training Accounts

REFERENCES: WIOA Public Law §108 and §134(c)(3); WIOA Department of Labor-Only Final Rule (81FR 56072, August 19, 2016); Training and Employment Guidance Letter WIOA No. 19-16; WIOA Title I 20 CFR §680 for Adults and Dislocated Workers; and 20 CFR Parts 651, 652, 653 and 658 for those served under Wagner-Peyser Act.

PURPOSE:

The purpose of this policy is to provide guidelines to the Service Providers of the Humboldt County Workforce Development Board (HC-WDB) in the provision of Individual Training Accounts (ITAs) for participants enrolled in the Workforce Innovation and Opportunity Act (WIOA) program.

BACKGROUND:

An Individual Training Account (ITA) is a payment agreement established on behalf of a participant with a training provider. The ITA is for tuition related costs noted as mandatory on a course description and/or class syllabus. Additional items needed by the participant to complete the course of study may also be provided, but they must be classified as a supportive service and the participant's financial need for such items must be documented in the participant file.

Training providers are selected by Adult and Dislocated Workers in consultation/agreement with their case managers, after an assessment and the development of an Individual Employment Plan (IEP).

Training providers are selected by Out-of-School Youth in consultation/agreement with their case managers, after an assessment and the development of an Individual Service Strategy (ISS).

Humboldt County Workforce Development Board

The HC-WDB, through the WIOA Adult Dislocated Worker and Youth programs, shall provide training services that lead to certificate/license/credential/degree, a competency or skill recognized by employers, or a training regimen that provide individuals with additional skills or competencies generally recognized by employers.

ITAs are allowed for out-of-school youth ages 16-24 per WIOA Section 129(c)(2)(D) and 20 CFR § 681.550.

The HC-WDB, through the WIOA Adult Dislocated Worker and Youth programs, reserves the right to make exceptions to this policy, on a case-by-case basis, should individual circumstances warrant exception.

DEFINITIONS:

Program –

- One or more courses or classes that, upon successful completion, lead to:
 - A certificate, associate degree, or baccalaureate degree; or
 - A competency or employer/industry skill recognized by Department of Labor.
- A training regimen that provides individuals with additional skills or competencies generally recognized by employers. Different programs may have differing goals, geographic location, curriculum and mode of delivery (classroom, correspondence, Internet, etc.).

POLICY AND PROCEDURE:

- I. To be eligible to receive an ITA, the participant must:
 - a. Be enrolled in the Adult, Dislocated Worker or the WIOA Youth program specific to Out-of-School Youth ages 16 to 24;
 - b. Be assessed by a WIOA Service Provider staff member and be determined to be in need of training to secure or retain employment;
 - c. Select an eligible training provider in consultation with a WIOA Service Provider staff member that is listed on the State of California's Eligible Training Provider List (ETPL); and
 - d. Have an IEP/ISS in the participant file showing the need for an ITA and confirmation that completion of the training is likely to lead to employment; and
 - e. If the participant is an eligible Out-of-School Youth, assure that the training:
 - i. Is the outcome oriented and focused on an occupation goal specified in the ISS;
 - ii. Be of sufficient duration to impart the skills needed to meet the occupational goal; and
 - iii. Results in the attainment of a recognized post-secondary credential.
- II. All participants must be tracked in the CalJOBS participant system. Training activities shall be tracked as follows:
 - a. Adults/Dislocated Workers
 - i. When an enrolled individual is participating in a training activity with a training provider listed on the ETPL, he/she shall be enrolled in Occupational Skills Training-(Approved ETPL Provider) – Activity Code

300. Tuition and all appropriate training related costs may be charged as Training Expenditures as outline in HC-WDB's 10 a. Training Expenditure Policy Statement.

- ii. When an enrolled individual is participating in a training activity with a training provider listed on the ETPL, and all or part of the tuition is being paid for with funding for a non-

WIOA funding source, and the Service Provider is paying for the remaining related costs, he/she shall be enrolled in Occupational Skills Training – (Approved ETPL Provider) – Activity Code 300. All appropriate training related costs (including any part of the tuition not paid by non-WIOA funding source) may be charged as Training Expenditures as outlined in HC-WDB's 10 a. Training Expenditure Policy Statement.

- iii. Training Providers Listed on Another State's ETPL: When an enrolled individual is participating in a training activity with a training provider that is headquartered outside of California and does not have an in-state training facility, but the provider is listed on another state's ETPL, he/she shall be enrolled in Out-of-State Training Provider Other ETPL - Activity Code 346. Tuition and all appropriate training related costs may be charged as Training Expenditures as outline in HC-WDB's 10 a. Training Expenditure Policy Statement. Service Providers must include a case note in the participant file explaining why this provider was chosen instead of a California ETPL provider, and include a printout from the Internet, with a date and time stamp on the printout, verifying the provider is listed on another State's ETPL.
- iv. Training Providers Not Listed on the ETPL: When an enrolled individual is participating in a training activity with a training provider that is not listed on the ETPL, he/she shall be enrolled in Occupational Skills Training (non ETPL provider) – Activity Code 328. WIOA does not allow the payment of tuition (in full or part) through an ITA for a training provider that is not listed on the ETPL, but "training related" costs may be paid. These "training related" costs, however, may not be charged as Training Expenditures as outlined in HC-WDB's 10 a. Training Expenditure Policy Statement.

b. Youth (Out-of-School, Aged 16-24 Only)

- i. Training Providers Listed on the ETPL - When an Out-of-School Youth, aged 16-24, is participating in a training activity with a training provider listed on the ETPL, he/she shall be enrolled in Occupational Skills Training – (Approved ETPL Provider) – Activity Code 416.

Priority shall be given to training programs that lead to recognized post-secondary credentials, and that align with in-demand industry sectors or occupations in the local area.

Costs shall be charged as "program expenditures."

- ii. Training Providers Not Listed on the ETPL-When an Out-of-School Youth, aged 16-24, is participating in a training activity with a training provider that is not listed on the ETPL, tuition payments cannot be made with WIOA funding. The participant shall be enrolled in Enrolled Post-Secondary Education-Activity Code 421.
 - iii. The participant can be assisted with books, fees (not tuition), school supplies, and other necessary costs, and these costs shall be charged as "Supportive Services," and the individual's financial need must be documented in the participant file. Youth receiving this type of supportive services shall be enrolled in Supportive Service: Post-Secondary Academic Materials – Activity Code 493.
- c. Youth (In-School Youth, Aged 14-21)
- i. WIOA funds may not be utilized to provide ITAs to In-School Youth. In-School Youth may, however, be assisted with books, fees (not tuition), school supplies, and other necessary costs, and these costs shall be charged as "supportive Services," and the individual's financial need must be documented in the participant file. Youth receiving this type of supportive services shall be enrolled in Supportive Service: Post-Secondary Academic Materials-Activity Code 493.
 - ii. In-School Youth who are attending post-secondary education that Subcontractors are supporting through supportive services as outlined in the previous paragraph should also be enrolled in Enrolled Post-Secondary Education-Activity Code 421. Even though Subcontractors are not paying tuition on behalf of this participant, they are supporting the youth through this activity. As with any youth (In-School or Out-of-School) enrolled in Enrolled Post-Secondary Education-Activity Code 421, monthly progress reports are required for as long as the youth is participating in post-secondary education and is enrolled in the WIOA program.
- d. Requirements/Limitations
- i. The dollar amount of each ITA varies based upon local WIOA Service Provider policy but shall not exceed \$10,000 per participant unless prior written approval is obtained from the HC-WDB.
 - ii. ITAS are normally issued for providers that appear on the State of California's ETPL. If it can be justified (as outlined in section II under the Participant Tracking section of this policy) to utilize a training provider in another state, the provider must be listed on the ETPL of its home state, and documentation of this listing must be included in the participant file.
 - iii. Each Service Provider shall develop and implement an Individual Training Account Policy that reflects local practice, including any additional restrictions beyond those outlined in this policy statement.
 - iv. It is the responsibility of the WIOA Services Provider to appropriately monitor a participant's progress in occupational classroom training (at

least once each calendar month), and assure timely collection of tuition refunds (as outlined in the training vendor's refund policy) when the participant is unable/unwilling to complete the training programs.

- e. Monitoring
 - i. HC-WDB shall review a sample of charges included in an ITA during on-site and desk reviews to assure compliance with this policy.
 - ii. Any costs that HC-WDB determines should not have been included as part of the ITA may be questioned, and Service Providers will have an option to transfer the charges to the Supportive Services cost category or pay for them with non-WIOA funding.
- f. Policy Exceptions-Service Providers may make exceptions to this policy only with prior written authorization from the HC-WDB Director.

FORM(S):

Personally Identifiable Information Acknowledgment

INQUIRIES:

Any questions regarding this policy may be directed to the Workforce Development Board Director at 707-445-7745.

Humboldt County Workforce Development Board Approval Required? Yes No