SCPa WORKS
SOUTH CENTRAL WORKFORCE DEVELOPMENT BOARD

Individual Training Account (ITA)
Policy #P-17-2.22

Re: Individual Training Account Policy

Updated   April 16, 2024
Originated: February 1, 2022
Approved: February 10, 2022
Revision Approved: N/A

References: WIOA Section 134(c)(3)(G)(i)
                          WIOA Section 134(d)(4)(G)
                          20 CFR 663.400
                          20 CFR 663.410
                          20 CFR 680.300
                          20 CFR 680.310
                          20 CFR 681.550

Author: Saranne Miller, SCPa Works Policy Manager

Forms: CareerScope Results
                          TABE Results
                          ITA Prerequisite Checklist
                          Job Search Log
                          Confirmation of Visit (x2)
                          ITA Contract for Training
                          ITA Modification Form

I.   Purpose:
A. The purpose of this Individual Training Account (ITA) policy is to ensure that every Workforce Innovation and Opportunity Act (WIOA) Title I participant is provided quality training services by eligible ETPs who receive payment for said services by way of an ITA. This policy outlines steps to ensure that training opportunities are made available to eligible job seekers, and that the opportunities are for training in vocations indicated on the High Priority Occupations (HPO) list.

II.   Affected Parties
A. This policy applies to contracted service providers who administer WIOA Title I Adult, Dislocated Worker, and Youth services within the SCPa Works eight-county service area. These contracted service providers are responsible for adhering to and implementing this policy to include the ITA procedures and attached standardized forms.
B. This policy will be utilized by the following service provider roles:
1. Case Manager
2. Training Specialist

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3. Performance Analyst
4. Program Manager

III. Background/Policy Overview
A. An ITA is a payment agreement established with a ETP on behalf of a participant as stated in 20 CFR 680.300.
  1. Based on individual assessment and funds available, an ITA can be awarded to eligible WIOA Adults, Dislocated Workers, and Out-of-School Youth (OSY) ages 18-24, and TANF (OSY only).
B. An ITA is designed to provide services to participants who are in need of training that prepares the individuals for employment in an HPO within the South Central region.
C. This ITA policy and procedures are designed to ensure service delivery consistency among ETPs while delivering guidance on WIOA-funded training options for Title I participants who are unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone.
  1. Training services are available to those participants who are unable to find employment or need upskilling to ensure a self-sustaining wage.
    a. An individual's need for training will be determined through an assessment mentioned below in section IV(A)(1)(b)(ii) of this ITA policy.
    b. NOTE: Participants with marketable skills within a High Priority Occupation (HPO) shall not be deemed as eligible for ITA training funds.
  2. The determination that a participant is unlikely or unable to obtain or retain employment without assistance will be detailed in the participant's Individual Employment Plan (IEP).
    a. This determination will be detailed in a case note entered into the participant's case record file in CWDS by the case manager.
D. ITAs are not an entitlement.
  1. WIOA participants who receive funds for training have been assessed by Title I staff and have been determined to have specific skill-related barriers to employment.
E. Training programs selected for ITA's must be within a High Priority Occupations, which is based on current labor market information with an emphasis on employment opportunities within the South Central Region. Training shall lead to an industry-recognized certificate, competency, or skill recognized by employers.

IV. Training Specialist:
A. Contracted service providers are required to employ a designated training specialist to administer ITAs for WIOA Adult, Dislocated Worker, and Youth programs, and EARN and TANF participants.
B. The training specialist is responsible for completing and verifying that the ITA application is complete and that the case record reflects the participant's knowledge of:
  1. The training program;
  2. The job requirements;
  3. The targeted demand occupation in the local area or proposed area of employment; and
  4. The commitment to complete the training program.
C. The training specialist will ensure that the class databases are up-to-date and contain current information.
D. The training specialist is responsible for tracking participant attendance, grades, and credentials or gains in all programs.

V. ITA Procedure

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A. The following steps reflect the standardized SCPa Works ITA procedure for contracted Title I service providers to follow in order to provide ITAs for eligible WIOA participants in conjunction with the approved Eligible ETP List (ETPL). See section VIII for guidance on Eligible ETPs (ETP).

B. Case managers will complete the Perquisites for Training form in alignment with the following steps:

1. The case manager will determine that the WIOA participant is in need of individualized career services, designating the participant as eligible to receive training services.
   a. A Title I participant who is in need of WIOA-funded training services can be eligible for said services without regard to how long the individual has been receiving WIOA services, to include basic and/or individualized services.
   b. A Title I participant who has paid out-of-pocket for an application fee or registration fee to an ETP can still be determined as eligible for an ITA, and can still enter into a WIOA-funded training with the ETP of choice.

2. The case manager will assess and address the participant's barriers and determine if the participant is in need of supportive services to overcome barriers. Please reference the SCPa Works Supportive Services Policy for further guidance.

3. The case manager will ensure that the participant has attended the designated HPO workshop and has documented as such in the case record notes in CWDS.

4. The participant will visit at least two ETP to complete research on available training that leads to a HPO of the participant's choice.
   a. The case manager will ensure that the participant will be able to obtain a job in the chosen HPO field upon completion of the ITA-funded training.

2. Participants are required to conduct research and prepare a training plan with the case manager and ETP (if applicable) prior to submitting a request for training funds. The following will be documented in the request:
   a. A list of occupations for which the training will prepare the participant;
   b. The local employment projections for the specific occupation(s);
   c. The entry level salaries of these positions;
   d. A comparison of two (2) ETPs from the State Approved Eligible ETP List (ETPL) that offer the specific training requested (if available);
   e. Evidence that the position is on the High Priority Occupation (HPO) list;
   f. A statement reflecting how the remaining tuition balance will be satisfied if the course amount exceeds the allowable SCPa Works ITA amount.

3. The case manager will submit a background check on behalf of the participant who is otherwise eligible for an ITA.
   a. The background check is required on all WIOA participants within the SCPa Works service area and will be completed within the first 14 days of enrollment.
   b. The background check will be paid for using a participant's supportive service dollars, will be accounted for utilizing the supportive services procedure and forms, and will affect a participant's supportive service lifetime limit.
   c. If a participant is enrolled in WIOA more than once in a lifetime, this mandatory background check will be required for every enrollment into the WIOA program. This will subsequently affect the overall dollar amount allocated for a participant's supportive services.

4. Participants will complete standardized assessments provided by the intake specialist or case manager with results indicating a sufficient aptitude level in the field of training, while low assessment scores will result in remediation.

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a. Standardized assessments include Career Scope, TORQ, O*NET, and TABE, and will be recorded by case managers on the appropriate results forms and on the ITA Contract.

    i. Case managers will enter the 8-digit O*NET 4.0 code that best describes the training occupation for which the participant is receiving services onto the designated line in the ITA Contract.

5. Participants seeking an academic credit-based ITA must apply for financial aid during their career search and before requesting access to WIOA funds for training.

    a. Case managers will assist participants with the FAFSA process at www.fafsa.ed.gov.

    b. Case managers will notify participants that the receipt of federal funding or financial aid may reduce the funding provided by SCPa Works.

6. The case manager will ensure that the IEP is updated with current career and training goals identified.

7. The case manager will refer the participant to the training specialist for ITA contract determination, cost allocations, and approval.

8. The training specialist will complete the designated ITA documentation to include the completion of:

    a. Adult/Dislocated Worker/OSY Contract for Training.

9. The training specialist will attach the appropriate ITA form(s), completed and signed, to the participant's IEP and will submit the paperwork to the service provider performance analyst.

    a. The completed ITA packet will include:

        i. CareerScope Results

        ii. TABE Results

        iii. ITA Prerequisite Checklist

        iv. Job Search Log

        v. Confirmation of Visit (x2)

        vi. Adult/Dislocated Worker/OSY ITA Contract for Training

10. The performance analyst will approve and document the ITA, and return the materials to the training specialist.

11. The training specialist will forward the approved ITA documentation packet to the ETP through which the participant will be added to the training class roster.

    a. The training specialist will follow-up with the ETP to ensure that the participant is enrolled for training and included on the ETP's training class roster.

12. The training specialist will verify that the participant started the training class on the actual training start date and communicates this information to the data performance team.

13. The data performance team will enter training service codes for the participant into CWDS.

14. The ETP will provide the training specialist with weekly progress reports or current grade point averages of the participant enrolled in training. The training specialist will forward the progress report to the case manager for case note documentation into CWDS.

15. At the completion of the training, the ETP will provide the training specialist with the certificate or credential earned by the participant. The training specialist will send the certificate or credential to the case manager for credential entry into CWDS.

16. The case manager will case note all details surrounding and relating to the ITA process to include the following points of interest:

    a. Enrollment

    b. Background check

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      c.   CareerScope/assessment appointment, results, & counseling
      d.   Training feasibility training with the case manager
      e.   Review of updated IEP and confirmation of career goal
      f.   Completion of a FAFSA application and attempts to source outside funding to cover the cost of training
      g.   A plan to cover training costs that exceed the ITA lifetime amount
      h.   Participant's choice of training
      i.   Participant's industry research and ETP visits
      j.   Appointment with training specialist to identify feasible program
      k.   Completion of ITA documentation
      l.   Approval of ITA documentation and submission of documentation to the ETP
      m.   Verification of the participant's start date of training
      n.   Data performance team entry of service code into CWDS
      o.   Receipt of the participant's weekly grades sent from the ETP
      p.   Acknowledgement of training completion
      q.   Receipt of training certificate from the ETP and credential entry into CWDS

C. If a participant withdraws from a subsidized training, or needs to alter the dates of the training, the training specialist will complete the the ITA modification form, send it to the training provider to determine the amount that is so be billed or refunded.
   1. The ITA modification form will be reference to complete adjustments to the participant's service record in CWDS.
   2. The adjustment made to the service record in CWDS will trigger payment issued to the vendor from the training provider.

VI. Limitations for Individual Training Accounts (ITAs):
A. ITA-funded training programs cannot exceed a duration length of 12 months.
B. The maximum dollar amount allocated for an ITA for WIOA Adult and Dislocated Worker participants within the SCPa Works service area is **$7,500.00**, and for WIOA/TANF Youth (OSY only) is **$3000.00.**
   1. This amount is a lifetime amount so that if an individual exhausts the allotted dollar amount, exits the program, and then reenrolls into WIOA/TANF for further services, that individual will no longer be eligible for ITA funding due to having previously exhausted the maximum dollar amount.
   2. WIOA/TANF Youth participants who exhaust the maximum **$3000.00** as eligible OSY Youth will be eligible for the WIOA Adult/DW maximum lifetime allotment if Adult programming eligibility is determined.
B. SCPa Works does not permit ITA administration for the purpose of associate degree attainment, or training that does not lend to the return on investment for the service area community.
   1. The focus of an ITA-funded training is emphasized on certificate programs and short- term training programs that prompts a seamless entry into the local workforce.
   2. Exceptions to this standard can be presented to the SCPa Works Programs Team.
C. All WIOA/TANF-eligible participants enrolled in the SCPa Works service area are eligible for a lifetime maximum of **$2000.00** in Supportive Services (#P-7A-1.22).

VII. **Recovery of Unused WIOA Training Monies**
A. To ensure the prompt return of any unused training monies, the training specialist will monitor and oversee the participant's monthly progress to include the following data points:
   1. Attendance;

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       2. Grades;

       3. Completion of the training program; and

       4. Receipt of certification or a credential otherwise.

C. If a change in the participant's progress occurs, the training specialist will immediately notify the program manager to have the case manager intervene, and ensure that training will resume regardless of the change.

       1. All changes made to the ITA following the start of a training program must be documented by the training specialist and included on a modified ITA application form and submitted to the performance analyst for approval.

       2. All changes to a participant's training plan and/or progress will be detailed in a case note.

D. If termination of the training program occurs; the training specialist will notify the performance analyst to update the ITA databases to reflect the early termination of training.

E. The performance analyst team will reach out to the funders Fiscal Unit. The Training Specialist is responsible for the collection of documentation to provide and have the WIOA performance Analyst team process any outstanding training and/or tuition refund.

VIII.   Appeals Process:

A. Participants have the right to appeal if they are denied training. If they believe they have been unfairly denied access to training through an ITA, they may file an appeal using the Programs Grievance Procedure.

IX.   Eligible Training Provider (ETP) Eligibility

A. Initial eligibility for the South Central ETPL applies to all registered ETPs.

       1. The ETPL is determined, compiled, and distributed by the Pennsylvania Department of Labor and Industry.

B. ETPs must adhere to the following requirements in order to maintain eligibility:

       1. ETPs must maintain current accreditation status through an accrediting body recognized by the Department of Education.

       2. The Pennsylvania Department of Education (PDE) must provide a statement of approval to the ETP indicating an "approval to operate" with a specified expiration date.

X.   ITA Policy Exception:

A. Exceptions include State-funded public ETPs and institutions, such as community colleges, apprenticeships, or ETP districts which require proof of accreditation only, not to include the statement of approval from the PDE.

B. ETPs must comply with all Equal Opportunity (EO) policies and procedures to include compliance with grievance and criminal activity reporting requirements and processes.

       1. The SCPa Works compliance department or a third-party monitor will review ETPs on an annual basis in alignment with WIOA Monitoring and Oversight.

XI.   Summary of Changes: This policy is reviewed annually by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
08/05/2022	Saranne Miller	1. Revised footer. 2. Included modification procedure; Sec. V.C.(1)&(2) 3. Removed TANF content from Sec. VI.	08/05/2022

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08/18/2022	Saranne Miller	1. Added Sec. V(B)(4)(a)(i) in reference to the DOL data validation requirement. 2. Added the the DV requirement for O*NET code in the ITA Contract. 3. Revised ITA Contract.	08/18/2022
11/23/2022	Saranne Miller	Added TANF Youth dollar amounts to section VI.	11/23/2022
11/28/2022	Saranne Miller	Corrected Section III in regard to TANF (OSY only).	11/28/2022
04/16/2024	Saranne Miller	Reviewed for edits. No revision necessary. Re-formatted header page.	04/16/2024

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