

Individual Training Account (ITA) Policy

The purpose of this policy is to provide guidance as to how an Individual Training Account (ITA) issued through the Northwest Pennsylvania Workforce Development Area (NW170) shall be administered.

Program participants shall work with their PA CareerLink® case manager on a regular basis to ensure that the Individual Employment Plan (IEP) is fully developed prior to an ITA being issued. The program services contractor shall manage the ITA approval and issuance process, following approval by the fiscal agent, and track expenditures of all resources paying for the participant's training.

The training provider and the program shall be on the state listing of approved programs. Funds shall be used only for those courses required by the program/certificate/degree.

The ITA shall be for an in-demand occupation on the High Priority Occupation List in the local workforce development area. The training provider's program needs to be within a reasonable commuting distance that the participant has agreed to, or in an area where the occupation is in demand and the participant is willing to relocate. Documentation of a participant's willingness and ability to relocate shall be provided. Preference shall be given to local occupations on the High Priority Occupation List and programs submitted by the local workforce development area training providers when making this determination.

1. All other forms of grant assistance from federal, state, or local aid (Pell Grants, PHEAA Grants, FSEOG grants, etc.) shall be used to work in conjunction with WIOA funding, to ensure that the participant is provided every available resource to successfully complete the training. The program services contractor and the training provider shall coordinate funding available to pay for the training. The fiscal agent shall neither duplicate, nor pay in addition to, WIOA Title I funds that have been awarded by another local workforce development area. ITAs shall not be issued for programs in which the expected grants/aid exceed the anticipated semester/term/program costs, as determined by the job-seeking participant, training provider, and PA CareerLink® staff. The training provider shall be responsible for repayment of the ITA/WIOA funds used to underwrite the training costs for other federal, state or local aid received after the disbursement of ITA funds.
2. The participant shall present PA CareerLink® staff with verification that they have applied for additional financial assistance.

3. Should the participant not complete the program for any reason, the standard refund policy of the training provider institution shall apply and the resulting refund shall be applied to the program funds from which the original obligation was made.
4. ITAs shall not be issued to any participant in default of a student loan. The participant shall have the default status removed prior to the approval of WIOA Title I funding.
5. It is preferable that the participant has a high school diploma or its equivalent prior to issuance of an ITA. However, when justified and properly documented, participants may pursue their high school equivalency diploma concurrently with training through an ITA.
6. Participants shall maintain at least a 2.0 cumulative GPA (on a 4.0 scale) or meet the training institution's minimum requirement if more strict. Academic probation shall suspend the ITA until such time that the participant is no longer on academic probation.
7. For any training that requires certification or licensure, the participant shall meet the requirements for qualification for certification or licensure prior to the first day of training. A letter from the training provider that the participant meets the requirements for training shall be documented in the participant file.
8. All required pre-employment clearances and/or testing shall be funded, as appropriate, by the allowable funding stream and shall be successfully documented by the WIOA Title I program services contractor.
9. All ITAs shall be limited to funding for one (1) training program. ITAs shall not pay for failures and/or course repeats. Under extenuating circumstances where subsequent training may be required, prior approval shall be received from the case manager and the Northwest Pennsylvania Workforce Development Board (NWPA WDB).
10. The length of an ITA shall be limited to 2 years; however, longer ITAs shall be evaluated on a case-by-case basis. ITAs shall not be modified in excess of 150% of the advertised length of program.
11. Upon approval of the ITA, a Letter of Commitment shall be sent to the training provider confirming the participant's course/program choice and funding approval. **The fiscal agent is under no obligation to approve funding for participants who start training prior to ITA approval and issuance of a Letter of Commitment.**
12. The NWPA WDB set an ITA funding cap of \$5,500 per participant. This is not a guarantee of \$5,500, but a maximum funding based on the actual costs of the approved training course/program. Funding shall only be used for *direct* educational expense, not for the provision of supportive services. No more than \$750 of expenditures shall be used for the rental/lease or purchase of required durable goods and supplies (not including textbooks). Required textbooks shall remain paid within the general \$5,500 funding cap. This policy excludes funding for guns, clubs, nightsticks, or mace.

When additional grant funding outside of the WIOA formula funding has been received and budgeted in the local workforce development area that allows for training eligible individuals, the limitation on the maximum funding cap to be paid per participant can be lifted.

13. For nonresidents of the local workforce development area, ITAs shall not exceed the funding amount of the ITA of the local workforce development area in which the job-seeking participant resides or \$5,500 (whichever is less).
14. **PAYMENT:** Funding shall be spread across the entire length of the program by semester/term or other standard billing time frame. No invoicing shall be submitted for payment by the training provider until the first day following the add/drop period per the training provider’s refund policy. All invoicing shall be sent directly to the participant. It is the responsibility of the participant to make the necessary arrangements for processing payments. Participants are required to present the training facility invoice to their PA CareerLink® case manager within 30 days of issuance, or the start of a semester/term. Payment requests presented after this 30-day period shall not be honored, unless a letter from the training facility accompanies the invoice explaining the delay. The PA CareerLink® case manager shall then coordinate information/invoicing with their fiscal operation, which shall trigger release of funds directly to the training provider. **No payment shall be made until after the add/drop period of the training provider has passed.**
15. **Assessment to Enter Training through an ITA:** Based on the results of a standardized Department of Education (DOE) approved assessment process (with the preferred assessment to be TABE, although alternative assessments from the DOE-approved list may be used at the discretion of the WIOA Title I program services contractor(s) if necessary to address documented participant barriers), each participant shall require additional services beyond basic career services to obtain or retain employment to be approved for an ITA. The participant shall possess the skills and qualifications to successfully complete the selected training program. At the completion of training, the participant shall be capable of becoming gainfully employed in the field for which they received training. The requirement for assessment can be waived at the discretion of the WIOA Title I program services contractor(s), if proficiency is demonstrated and documented.

Other guidelines may be added by the NWPA WDB that may be necessitated by federal and/or state regulation, regional oversight, or local recommendation.

REFERENCE

WIOA Section 134(c)(3)(G)(i)
20 CFR Part 680.300 – 340

HISTORY

Name	Date	Rev. Level	Description of Change	Effective Date
Deb O’Neil	08/07/2014	A	Policy approved by new LWIB	08/20/2014

Deb O'Neil	10/09/2014	B	Revisions per local plan requirements	12/17/2014
Deb O'Neil	04/02/2015	C	Revise assessment language	04/15/2015
Deb O'Neil	03/28/2017	D	Update language	04/28/2017
Deb O'Neil	08/17/2018	E	Update assessment options for participants with barriers	10/12/2018
Deb O'Neil	10/31/2018	F	Add ITA funding cap exception for special grant funding	12/14/2018