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## **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 Title I program services contractor on a regular basis to ensure that the Individual Employment Plan (IEP) is fully developed prior to an ITA being issued. The Title I 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 state-approved training programs on the Eligible Training Provider List (ETPL) in High Priority Occupations (HPO) as approved on HPO lists, both local and in other workforce development areas across the state. 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 should 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 Title I program services contractor must obtain prior participant approval for the release of confidential student aid information. The Title I program services contractor must identify all instances in which Pell Grants can either reduce WIOA program costs or provide additional necessary services to the participant. The identified Pell Grants shall be used to maximize WIOA program funds. The Title I 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 nor payment made through any additional grant funding. 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<sup>®</sup> 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. The training provider must refund WIOA program funds prior to issuing any other refunds.

The Title I program services contractor must develop procedures to ensure effective determination of participant training needs and the best use of WIOA program and Pell Grant funds.

The Title I program services contractor must maintain worksheets to document participant income and expenses. To ensure that participants continue to be eligible for Pell Grant funds, participant worksheets must be reviewed and signed off by the Title I program services contractor fiscal staff and any changes in participant income must be documented.

2. The participant shall present Title I program services contractor 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 Title I program services contractor.
9. An eligible individual may receive more than one ITA if the training is part of a career pathway (i.e. Certified Nursing Assistant to Licensed Practical Nurse career pathway in the healthcare sector). In order to receive more than one ITA,

individuals must show proof of successful completion of all prior ITA-funded training. Additional ITAs must be for an occupation within the same industry. Receipt of more than one ITA requires approval from NWPA Job Connect. All other requirements of this policy apply to the initial and additional ITAs awarded to an individual. ITAs shall not pay for failures and/or course repeats. The ITA funding cap is a total of \$5,500 per participant.

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. NWPA Job Connect 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 the Title I program services contractor 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 Title I program services contractor 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 CASAS, although alternative assessments from the DOE-approved list may be used at the discretion of the Title I program services contractor 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 Title I program services contractor if proficiency is demonstrated and documented.

In extreme circumstances when CASAS assessments cannot be managed in a group setting and must be completed on a one-on-one basis, NWPA Job Connect has provided flexibility to the Title I program services contractor to use CASAS Goals Academy as an alternative assessment tool for appropriate participants to enter training through an ITA. The participant must be comprehensively case managed and the Title I program services contractor must monitor the participant’s progress on CASAS Goals Academy to ensure that they have achieved the level to be successful in the training prior to issuing an ITA.

Other guidelines may be added by the NWPA Job Connect 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
Deb O'Neil	03/29/2019	G	Add flexibility for HPO list occupations and allow more than one ITA for career pathways	04/12/2019
Deb O'Neil	06/01/2020	H	Add flexibility for CASAS Academy due to COVID-19 restrictions	07/10/2020
Deb O'Neil	08/05/2020	I	Add language required by USDOL for Pell Grants and participant income	09/11/2020