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Southwest Georgia Workforce Development Board

Policy/Procedure Name: Individual Training Accounts (ITA)

Policy/Procedure #: WIOA-2017-033

Effective Date: December 6, 2016

Rescinds Policy #33 Individual Training Account Policy dated 2/3/15

Revision Date: February 28, 2018

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PURPOSE.

This policy addresses the use of WIOA Title I funds for training services provided through Individual Training Accounts (ITA). Training services means any WIOA-funded and non -WIOA funded training service. Individuals with other employment issues shall be afforded opportunities for participation in training activities designed to improve participation in the workforce and lead to higher earnings for individuals who successfully complete them. Training activities for persons in these groups will be provided in the context of the state's vision to provide universal access for all participants.

The authority for this policy derives from the Workforce Innovation and Opportunity Act of 2014 (WIOA) which provides that, with limited exceptions, WIOA training services for Adults and Dislocated Workers will be provided through the use of Individual Training Accounts (ITA's). The WIOA Final Regulations describe the authority of local workforce boards with respect to ITA's.

STATE POLICY.

Reference Technical College System of Georgia (TCSG) – Office of Workforce Development (OWD) Policy and Procedure Section 3.4.1.1 INDIVIDUAL TRAINING ACCOUNTS (ITA)

LOCAL POLICY.

1. Training Services may be provided to Adults and Dislocated Workers:
 - a. Who have met the eligibility requirements for career services and have been determined to be unable to obtain or retain employment leading to self-sufficiency through such services;
 - b. Have been determined to be in need of training services and to have the skills and qualifications to participate successfully in the selected program of training services;

- c. Who have a completed Individual Employment Plan (IEP) that indicates, through interview, evaluation or assessment, the participant's employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals that have been identified.
- d. Who select programs of training services that are directly linked to the employment opportunities in the local area involved or in another area in which individuals receiving such services are willing to relocate; and
- e. Who are unable to obtain other grant assistance for such services, including Federal Pell Grants and other federal grants to pay the cost of their training; or
- f. Require assistance beyond that available under grant assistance from other sources (including Federal Pell Grants, and other federal grants) to pay the cost of their training (in making this determination LDWA staff may take into account the full cost of participating in training services, including the cost of support services and other appropriate costs); and who are determined to be eligible in accordance with the priority for services criteria and the service provider's determination of funds available to provide the service.

In accordance with TEGL 19-16, Department of Veterans Affairs (VA) benefits for education training do not constitute "other grant assistance" under WIOA eligibility requirements. Therefore, eligibility for VA benefits for training services do not preclude a veteran or the veteran's eligible spouse from receiving WIOA-funded services, including training funds. Similarly, WIOA program operators shall not require veterans or spouses to exhaust their VA-funded training benefits prior to allowing them to enroll in WIOA-funding training.

- g. Training services may be provided to an individual who otherwise meets the requirements as noted above while an application for a Federal Pell Grant is pending (provided that the service provider has made arrangements with the training provider and the participant regarding the allocation of the Pell Grant), except that if such individual is subsequently awarded a Federal Pell Grant, the training provider must reimburse the service provider the WIOA funds used to pay the **tuition** portion of the training costs from the PELL Grant.
- h. Where program operators have considered all available sources of fund, excluding loans, in determining an individual's overall need for WIOA funds. Resources such as PELL, and other federal grants should not be included in calculations of the level of WIOA assistance until the grant has been awarded.

Tuition is the sum charged for instruction and does not include fees, books, supplies, equipment and other training related expenses. [20 CFR Part II.

Summary & Explanation pp. 49328 & 49329]. Reimbursement is not required from the portion of the PELL Grant assistance disbursed to the participant for education-related expense.

2. Training services shall be provided through providers listed on the Georgia Eligible Training Provider List (ETPL) unless noted otherwise in the following list of training services. Out-of-state and on-line training provider programs must be on their state's ETPL; and, if not on that state's list, the service provider must determine the reason. If the provider has been determined not eligible by another state, then they cannot be added to Georgia's ETPL, and cannot be used as a training provider. If there is another reason they are not on their state's list (i.e. an overly cumbersome application process, etc.) then, they can be added to Georgia's ETPL through normal application process. **ETPL verification printout shall be documented in the participant's file.** Through TCSG-OWD, the Eligible Training Provider List is accessible at www.worksourcegaportal.com.
3. Training services may include:
 - a. Occupational skills training, including training for nontraditional employment and for training programs operated by the private sector; (requires ETPL approval)
 - b. On-the-job training; (does not require ETPL approval)
 - c. Incumbent worker training; (does not require ETPL approval)
 - d. Programs that combine workplace training with related instruction, which may include cooperative education programs; (requires ETPL approval)
 - e. Training programs operated by the private sector; (requires ETPL approval)
 - f. Skill upgrading and retraining; (requires ETPL approval)
 - g. Entrepreneurial training; (requires ETPL approval)
 - h. Apprenticeship; (USDOL RA Programs automatic ETPL eligibility)
 - i. Transitional Jobs (does not require ETPL approval)
 - j. Job readiness training; (does not require ETPL approval)
 - k. Adult education and literacy activities provided in combination with services described in any of clauses (i) through (vii) of WIOA Section 134 (c)(3); (does not require ETPL approval)

- I. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training. (does not require ETPL approval)

4. Coordination of Funds

WIOA funding will be coordinated with all other available funding sources such as HOPE and Pell and detail how all other funds will be used prior to expending WIOA funds.

WIOA funds will be used to supplement rather than supplant Pell Grant, HOPE Grant/Scholarship awards and other funding sources.

Participants interested in an Individual Training Account (ITA) must apply or must have applied for HOPE, Pell, and all other appropriate funding sources prior to issuance of an ITA.

WIOA participants may enroll in training while Pell, Hope, and other funding sources are pending as long as the appropriate arrangements have been made with the training institution regarding the allocation of all grants and funding sources.

Service Provider staff must conduct an analysis of the participant's financial needs (cost of attendance) to document a participant's total cost of attending training. This analysis includes, but is not limited to, the costs of tuition, fees, books, supplies, transportation, childcare, living expenses, and other appropriate personal and educational related expenses. The documentation supporting this determination should be maintained in the participant's electronic case file in the WorkSource Portal.

If it is determined through the analysis of the cost of attendance form that the total cost of attending training exceeds the amount available through HOPE and WIOA funding, then Pell funds may be utilized by the participant for living and other appropriate personal expenses during the training period.

5. Training Payments

The service provider must verify and pay tuition and other training costs in accordance with the training provider's documented payment policy or terms. WIOA funding may be used for any expenses considered to be part of the cost of attendance that cannot be met from the PELL or other grant assistance. In situations of co-enrollment with other WIOA or non-WIOA programs, staff will coordinate with the training provider and other program(s) to ensure the participant's training needs are met and there is no duplication of services. WIOA funding shall always be a supplement to other grant assistance.

6. Local parameters for Service

- a. Training must be in occupations identified in the local area's Demand Occupations List/Southwest Georgia WIOA Plan as growth and/or demand occupations or documentation of employment prospects for areas not listed should be provided.

- b. Training must result in an employment wage sufficient to attain self-sufficiency, and/or career progression toward self-sufficiency without the aid of public assistance.
- c. Programs should not exceed 104 weeks (two years). Exceptions to this policy may be approved on a case- by-case basis and requests should include evidence that financial support is available during extended training periods.
- d. In general, all training programs must be within a reasonable commute of the WIOA local area that may include out -of-the-area and out -of-state training institutions. Out-of-the-area training programs that are not within commuting distance to the WIOA local area may be approved on a case-by-case basis. All approved training must be located within the contiguous United States.
- e. All applicants must apply for the Pell Grant and/or HOPE Scholarship program, if eligible. Depending on the need and availability of WIOA funding, PELL funds may be combined with WIOA funds to cover total expenses.
- f. WIOA funding may be provided for college level instruction only if all of the following conditions have been met:
 - 1. The participant must be accepted into a certificate, degree, or diploma program, and the course of study must be occupation-specific (i.e., radiological technician, accounting, teacher certification). No funds shall be provided for general academic programs (i.e., General Studies, Bachelor of Art, etc.)
 - 2. Total course of study will take no longer than 104 weeks (2 years) to complete and be a certificate, diploma, or degree program.
 - 3. The participant must demonstrate that s/he has the financial resources to attend long-term training.
 - 4. Continuing Education and other similar courses will be approved if the following conditions apply:
 - The participant must have a specific occupational/employment goal.
 - The participant must present evidence describing how the proposed training will increase his/her employment marketability.
- g. ITAs may be utilized for expenses related to training, including, but not limited to: books, tuition, fees, supplies, tools, uniforms and shoes, certification, licensing, testing fees, drug testing for entrance into training, medical requirements for training entrance, etc.

- h. Participants accepted on a provisional basis may receive assistance on a case-by- case basis.
- i. ITAs will not be used for payment of late fees caused by participant error or delay. The participant will be responsible for these fees, as s/he is responsible for other fines or penalties.
- j. The maximum amount for anITA per participant is a maximum amount of \$ 10,000 excluding supportive services. (Supportive Services Caps can be found in SWGA WDB Policy #25 – Supportive Services)
- k. A participant “pick-up” is defined as any person currently enrolled in a technical school or college level training program using non-WIOA funds and find themselves in need of WIOA funding assistance to complete training, either to augment or replace funding that has been lost. The participant must meet the criteria as defined within this policy in addition to the criteria set forth in the section below.

7. “Pick Up”

A participant “ pick -up” is defined as any person currently enrolled in a technical school or college level training program using non -WIOA funds and find themselves in need of WIOA funding assistance to complete training, either to augment or replace funding that has been lost. The participant must meet the criteria as defined within this policy in addition to the criteria set forth in this section.

- a. Pick up may only be available for students enrolled in a state, technical or private schools on the Eligible Training Provider List (ETPL).
- b. All “pick -ups” must have at least one semester remaining in his/her program of study.
- c. “Pick-ups” must currently be in school full -time and have a minimum GPA of 2.0.
- d. Schools for which financial obligations are fully completed at onset of training will not be considered, since all financial agreements have already been established prior to WIOA request. Policy prohibits paying an outstanding balance for a school’s cost for which an individual has already made personal commitment for payment.
- e. All “pick -ups” must have appropriate WorkSource Staff approval. Appropriate documentation and explanation of the inability of the individual to continue due to financial constraints or other reasons must be provided with the request. This includes an explanation of why the previous funding method is now inadequate.
- f. “Pick-ups” may not be required to complete a full array of career services if they are enrolled in Georgia Technical College, University System or private institution where they have evidence of prior testing or have a current transcript

and are in good standing at the institution. Individuals will be required to provide adequate labor market information to justify that training-related employment is likely for individuals with similar work histories and education.

Under extenuating circumstances, the service provider may request an exception on a case-by-case basis by presenting the specific situation to WDB management for review.

8. Disaster and Emergency Training Services

In the event of a natural disaster or declaration of an emergency situation, the following provisions shall immediately be available for enrolled participants. These provisions shall become effective immediately upon the declaration of a State of Emergency within the Southwest Georgia region and/or the State of Georgia by the Governor and/or the President of the United States. Participants must have been enrolled in training services at the time of the declaration; OR enrolled into training services following the State of Emergency in order to qualify for supportive services. The provisions shall remain in effect until the State of Emergency is lifted OR amended by the SWGA Workforce Development Board.

A. Suspension of Alternative Funding Source

1. Participants shall be allowed to document the absence of funds from other sources by signed self-attestation if unable to provide required documents.

B. Length of Training

1. Participants shall be allowed to exceed the 2-year training period if training schedules are impacted due to the declaration of emergency.

C. Remote Learning and Additional Training Needs

1. Training participants shall be permitted to complete courses remotely, if authorized by the training provider. Participants shall be eligible to make requests for additional training materials required in order to complete training, such as computers or access to internet services.
2. Additional training costs that are required due to the emergency situation will not be applied to the ITA per participant maximum funding amount.

REFERENCES

Technical College System of Georgia – Office of Workforce Development Policy and Procedure Manual, Section 3.4.1 – Individual Training Accounts (ITA)

WIOA Section 134(b)

USDOL TEGL 3-15, Guidance on Services Provided through the Adult and Dislocated Worker programs under WIOA

USDOL TEGL 19-16

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