

## **INDIVIDUAL TRAINING ACCOUNT**

### **WORKFORCE INNOVATION AND OPPORTUNITY ACT POLICIES AND PROCEDURES**

EFFECTIVE DATE: DECEMBER 16, 2021

POLICY #: P205 V.8

#### **I. PURPOSE**

This policy communicates the Workforce Development Council of Seattle-King County (WDC) local workforce development board policy and operational guidance for providing Individual Training Accounts (ITAs) to WIOA eligible, enrolled adult, dislocated worker and youth customers under the Workforce Innovation and Opportunity Act (WIOA).

#### **II. BACKGROUND**

ITAs are one option to fund training for WorkSource customers who are unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages than previous employment through basic and individualized career services alone. ITAs provide WIOA Title I-B funded training services for WIOA eligible and enrolled adults, dislocated workers and youth to purchase training services from eligible training providers selected in consultation with an Employment Specialist.

#### **III. DEFINITIONS**

- A. Good Cause - "Good cause" for failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress. Good cause includes, but is not limited to:
  - i. Illness, injury or disability of the participant or a member of the participant's immediate family;
  - ii. Severe weather conditions or natural disaster precluding safe travel;
  - iii. Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant;
  - iv. Acting on advice received from an authority such as the training provider, instructor, or case manager;
  - v. Training is delayed or cancelled;
  - vi. Accepting stop-gap employment with hours or other work conditions that conflict with the training;
  - vii. Accepting goal-related employment prior to completion of training.
  
- B. Individual Training Accounts (ITAs) - the mechanism by which the WDC awards funds to cover all or a portion of the cost of training services for eligible customers fully enrolled as WIOA Title I Adults, Dislocated Workers and/or Out of School Youth ages 16-24.

## IV. POLICY

### A. Eligibility:

- i. ITAs will only be issued to customers fully enrolled as WIOA Title I Adults, Dislocated Workers and/or Out of School Youth ages 16-24 who have:
  - a. Been assessed and determined to need training to achieve their employment goals;
  - b. Been assessed and determined to be able to participate successfully in a training program; and
  - c. Completed an Individual Employment Plan.
- ii. ITAs are not entitlements and shall be provided to eligible customers on the basis of an individualized assessment of the customer's job readiness, employment and training needs, financial, social and supportive needs, labor market demand and potential for successful completion, as documented in the customer's Individual Employment Plan (IEP) or Individual Service Strategy (ISS). The career specialist works with the customer to develop an educational plan that includes.
- iii. The training provided through an ITA should result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment for the customer.
- iv. WDC policies regarding Priority of Service (including for veterans and their spouses) and WIOA Income Guidelines apply to ITAs. These guidelines are available at <http://www.seekingwdc.org/policies-guidelines>.

B. Customer Choice: Employment specialists must provide customers who may be eligible for an ITA with information regarding how the local system provides training funds, the dollar limit of the award, customer responsibilities, training choices available through the [Eligible Training Providers List \(ETP\)](#) consumer any information related to the training/training provider in order to maximize customer choice.

C. Customer Responsibility: Customers requesting an ITA are expected to use skills assessments, labor market conditions/trends, training providers' performance and any other relevant data to determine which training will help them reach their employment goals and to take an active role in managing their training and employment future.

### D. Limitations:

- i. An ITA is limited in cost and duration.
  - a. The maximum lifetime ITA award is \$7,000 over a two-year period.
  - b. On a case-by-case basis, the WDC may provide agree to increase the

- award amount and/or extend the award period.
- c. Such a request must be made by an employment specialist and must include justification for the increased award and/or extended timeline as it relates to customer's ability to attain or retain livable wage employment or to make significant wage progression.
  - ii. ITAs will be awarded for occupational skills training programs that are available on the state [Eligible Training Provider List](#), result in a post-secondary credential and are selected by the customer in consultation with an employment specialist. Training services that do not rise to the level of occupational skills training, including intensive and short-term prevocational services, literacy, internship, work experience and other training activities that do not provide formal occupational skills training as described in WIOA Sections 134(d)(3)(C) and 134(d)(3)(C)(vi) and 20 CFR 680.320, may also be funded with an ITA. These training services will be recorded in ETO as Workforce Preparation or Short-term Vocational Services, as appropriate based on the service definitions in the [Services Catalog](#).
  - iii. ITAs may only be issued for occupations that are in demand on the [Occupations in Demand Listing](#), unless otherwise approved by the WDC. Employment specialists may request ITA funds for an occupation that is not listed as in demand on the Occupations on the Listing as long as they can prove that there is a demand for the occupation and that the customer will make sufficient progress toward self-sufficiency to warrant the investment of resources into the training activities.

E. Coordination with Other Resources:

- i. ITAs are used to supplement but not supplant other resources. ITAs fund training costs for customers who are unable to obtain assistance, other than loans, from other sources to pay for their training or who require assistance beyond what is available from sources, other than loans, to pay for training.
  - a. When awarding an ITA, an employment specialist must help the customer identify and apply for any applicable resources, such as Pell Grants, tuition assistance/exemption, employer training subsidies, apprenticeship dollars, other federal programs or ITA dollars from other workforce regions, as appropriate.
  - b. If other resources are identified, the final ITA amount will be adjusted to reflect any financial assistance received from other sources.
  - c. ITAs may not be used to repay loans. The mere existence of a federal loan must not impact eligibility determinations for ITAs.
- ii. ITAs may be combined with supportive services resources as described in [WDC Policy P201 Supportive Services](#) to cover the cost of books, fees and other educational materials or supplies, in addition to tuition.

- iii. Employment specialists must track expenditures of all resources paying for a customer's training, including the WIOA Title I funds provided through the ITA.
- F. Method of Payment: ITA payments may be made in a variety of ways including vouchers, the electronic transfer of funds through financial institutions, or other appropriate methods.
- G. Satisfactory Progress:
- i. The ITA award will be paid incrementally on a quarterly basis, based on the customer making satisfactory (see Definitions) progress, except for good cause (see Definitions).
  - ii. Customers must consult with an employment specialist, at a minimum at the end of each quarter during the lifetime of the training plan to ensure that the customer is making satisfactory progress in training.
  - iii. The training provider will certify the customer's satisfactory progress with the signature of the registrar or an equivalent person designated by the training institution or a copy of the customer's school/training provider transcript or course grades, showing progress.
  - iv. If the customer is not making satisfactory progress each quarter, the employment specialist may either renegotiate an ITA or de-obligate ITA funds.
  - v. Dropped or incomplete classes may result in the de-obligation of ITA funds.
- H. Removal of a program from the ETP: If a customer using an ITA is enrolled in a training program that is removed from the state Eligible Training Provider List (ETPL), the customer may complete the training. An ITA should not be modified or extended for a customer beyond the original approved plan for a training program that is no longer on the ETPL.
- I. Exceptions to policy: Contracts for training services may be used instead of ITAs only when one of the following three exceptions applies:
- i. When the services provided are on-the-job training (OJT) or customized training (see [WDC Policy P208 V2 On the Job Training](#));
  - ii. When the WDC determines that there are an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs. The WDC will research advertised offerings, projected student enrollments and enrollment capabilities of training programs for the following quarter to determine if training slots are full and consequently ITAs are inadequate for WIOA participants to pursue high demand training of their choice (see WDC Policy 08-2001 Training Provider Eligibility and Appeals);
    - a. When the WDC determines that there is a training service program of demonstrated effectiveness offered in the area by a community-based organization (CBO) or another private organization to serve

individuals with barriers to employment (see [WDC policy P203 V3 Customized Training](#)).

Exception request forms can be found at: <https://www.seekingwdc.org/policies-guidelines>.

## V. PROCEDURES

- A. Before awarding ITAs, employment specialists must ensure that the customer
- iii. Has completed a full WIOA eligibility application and enrollment;
  - iv. Has completed an Individual Employment Plan;
  - v. Has the skills and qualifications to successfully complete the selected training program based on assessments (limited English proficiency should not be a barrier, but supplemental intensive language training should be provided for those with limited English proficiency);
  - vi. Has applied, with support from the employment specialist, as needed, for appropriate and applicable sources of financial aid, other than loans, such as Pell Grant, tuition assistance/exemption, employer/union subsidies, apprenticeship dollars, or ITA dollars from another county if the individual resides in another county.
  - vii. Has completed the WDC required training research proposal.
  - viii. Is aware of the expectation to make satisfactory progress and participate actively in the management of their educational plan.
- B. Before awarding an ITA, employment specialists must also ensure that
- ix. The training for which the ITA is to be used is on the Eligibility Training Provider List;
  - x. The training is for an occupation in demand in King County's labor market.
  - xi. The ITA only pays up to the cost of State of Washington resident tuition rate;
  - xii. The customer has applied for other forms of financial assistance.
- C. Customers must be enrolled in approved training within 30 days of the ITA award designation. Participants will be considered enrolled in training if they:
- xiii. Are pre-registered for classes or on a waiting list of an approved training provider;
  - xiv. Have a starting date of training that is not more than one quarter or term in the future.
  - xv. Exceptions to the above criteria are:
    - a. Class cancellation;
    - b. Health problems (with doctor's letter as proof);
    - c. Demonstrated childcare barriers;
    - d. Job related factors (with employer's letter as proof).

## VI. REFERENCES

AUTHORITY	RULE OR REGULATION	REFERENCE AND WEBLINK
WDC policy	WIOA Adult, Dislocated Worker, and Youth Eligibility Policy	<a href="#">Policy P200 V7</a>
WDC policy	Customized Training	<a href="#">Policy P203 V3</a>
WDC policy	On the Job Training	<a href="#">Policy P208 V2</a>
WA Employment Security Department	Individual Training Accounts	<a href="#">Washington WorkSource System WIOA Policy 5601 Revision2</a>
WA Employment Security Department	Governor's Procedures for Determining Training Provider Eligibility	<a href="#">WIOA Title I Policy 5611 Rev 2</a>
Washington State Legislature	Training Benefits	<a href="#">WAC Chapter 192-270</a>
Code of Federal Regulations	Adult and Dislocated Workers Activities Under Title I of WIOA	<a href="#">20 CFR 680.300, 680.310, 680.320, 680.330</a>
	Are Individual Training Accounts Permitted for Youth Participants?	<a href="#">20 CFR 681.550</a>
United States Congress	Workforce Innovation and Opportunity Act	<a href="#">Section 134(c)(G) – Adult and Dislocated Workers &amp; Section 129(c)(2)(D) – Youth</a>

## VII. HISTORY

VER.	DATE	ACTION AND APPROVALS
V.1	9/1/2005	Released
V.2	7/1/2007	Revision released
V.3	7/14/2009	Revision released
V.4	10/29/2009	Revision released
V.5	6/25/10	Revision released
V.6	1/17/17	Revision released
V.7	2/14/19	Updated references and format. Released for public comment.
V.8	12/16/2021	Administrative changes made; revision released