Individual Training Account Policy/Procedure

Purpose
The purpose of this policy/procedure is to provide guidelines for staff to follow when processing Individual Training Accounts (ITAs) for Workforce Innovation and Opportunity Act (WIOA) eligible participants to attend classroom training.

Background
WIOA classroom training services for eligible participants are provided through ITAs. WIOA eligible participants must demonstrate a need for formal training through the failure to obtain and/or retain employment that leads to self-sufficiency. Obtaining higher wages than previous employment is also a demonstration of a need for formal training. Participants and their assigned Employment & Training Counselor (ETC) utilize information such as skills assessments, labor market conditions/trends, and training providers' performance, to allows for the best choice of training and training provider that will lead to a positive outcome. ETCs may determine training is appropriate regardless of whether the individual has received basic or individualized career services.

Job Link training services are aligned with the local in-demand industry needs in order to provide the skilled workforce employers need to compete in the global economy. Job Link's focus is to prioritize resources where overall job growth and total job openings are positive.

Policy
ITAs are not entitlements and may only be provided to individuals determined to meet all Participant Criteria and for a program that meets all Program Criteria. Priority of Service and availability of funds may be considered in the approval of all ITAs. An ITA is limited in cost and duration, as outlined in this policy.

Steps to ITA Approval
ITAs shall be provided to eligible participants on the basis of an assessment and training needs. ETCs will send the ITA to their Supervisor for approval using the following step by step process:

Step I – Participant Criteria:
ETC will evaluate and document the participants need and appropriateness for classroom training after individual appointments, assessment and completion of steps A & B of the WIOA Scholarship Application. ETC will assist, as needed, with the completion of all paperwork. Determine if the participant is unable to obtain or retain employment with current skills; and
- Possesses the skills and qualifications to successfully complete the selected program; and
- Is unable to obtain financial assistance from other sources to pay the costs of training or requires assistance beyond what is available under grant assistance; and
- Has available WIOA funding, see Previously Funded Client policy for determination process; and if pertinent
- Has two full time semesters or less to graduate, if completing a Bachelor's program.
- Required to apply in their local area before Job Link will consider funding (see Out of County Resident policy), if from outside our area.

Step II – Program Criteria:

ETC will evaluate completed part C of the WIOA Scholarship Application and determine if the selected training program meets all criteria (see Program Criteria chart below for details):

Program Criteria

Listing on the ETPL does not guarantee a program is eligible for WIOA funding. All training programs, including pre-apprenticeship, must be listed on the ETPL and meet all of the following criteria in each category:

In Demand	Industry Recognized	Self-Sufficient Wage & Advancement
Training must be for an occupation in an emerging and growing industry, which is lacking qualified candidates for current and future work-force needs. The program must be listed as an in-demand occupation in one of the following: • Occupational Outlook • EDD Labor Market Information • CalJOBS *If program doesn't meet this criterion it will not be eligible for WIOA funding. The client can also prove this through submission of job ads that demonstrate a demand in their chosen occupation.*	The program must result in the awarding of a credential, national or state certificate, or degree, and/or skills that meets industry standards. The term "industry recognized credential," means a credential that: • Is sought or accepted by employers within the industry involved as a preferred, or required credential for hiring or advancement; and, • Where appropriate, is endorsed by a nationally recognized organization representing the industry. *If program doesn't meet this criterion it will not be eligible for WIOA funding.*	Training should result in a Self-sufficient wage job (200% of the LLSIL for one). Or Documented opportunity for advancement through an established career pathway. Support material must be submitted as part of the scholarship paperwork. Material may include, but is not limited to: • O*NET related jobs • Career One Stop.org *If program doesn't meet this criterion it will not be eligible for WIOA funding.*

Additionally, the local Workforce Investment Board (WIB) along with the Economic Development Board (EDB) may identify new emerging industries to place in the local priority sectors, which Job Link will target.

Step III – Review, Compile and Document:

ETC will review WIOA Scholarship Application for completeness. If accepted, ETC completes the Scholarship Application Forms Packet indicating funding source, total funding requested, and signed agreement by participant. A "Scholarship Rationale" case note must be entered into the system including, but not limited to:
- Participant's criteria met; and
- Program criteria met; and
- Relevant funding circumstances, see Funding/Payment Guidelines for details
- Indicate the participant's WIOA priority status based on the Priority of Service policy
- Indicate the steps taken to determine training is needed

- Indicate how it was determined the person was able to successfully participate in the training
- Explain client's industry focus goals
- Explain steps taken to determine funding of last resort (FAFSA, BOG Waiver, Pell, Other?)
- Indicate training program/type, and amount requested
- Additional ETC Notes

Step IV – Submit for Approval
ETC will submit all required paperwork to their Supervisor. These include the following:
- DMV Printout if required
- Assessment Results
- Scholarship Application
- Rationale
- Priority of Service & List of Barriers
- Authorization to Bill

Supervisor will approve or deny request after reviewing all scholarship paperwork and availability of funds. Supervisor will update the Job Link funds tracking database with all required information.

In Demand Determination Tools
Targeting the right occupation is essential and requires the use of reliable data sources. ETCs must utilize one of the following sources to verify an occupation meets the in-demand criteria:

Employment Development Department Labor Market Information site:
Use this tool to find the fastest growing occupations in Sonoma County. To use this tool, go on the internet to www.labormarketinfo.edd.ca.gov.
1. In the section under LMI by Subject, select "Employment Projections".
2. Under "Select Area Name" use the drop down to select Santa Rosa MSA (Sonoma County
3. Review the 2020-2030 Industry Sector Employment Projections on the right
4. Below you will see the 2020-2030 Occupations with the Most Job Openings, followed by the 2020-2030 Fastest Growing Occupations
5. Use all three of these to determine if the occupation meets the in-demand criteria

CalJOBS
Use this tool to find the occupations with the highest projected growth in Sonoma County. To use this tool, go on the internet to www.caljobs.ca.gov.
1. In the Job Seekers section, select "More Career Services"
2. Under Labor Market Services choose "Labor Market Facts"
3. Extend the "Occupational Information for Your Local Area" section, click the "+"
4. Click "What occupations are predicted to have the most future job openings in an area?" link (4th one down)
5. Enter "County" as the area type and "Sonoma County, CA" as the specific area
6. Click "Continue"
7. Click on the settings wheel in the upper right corner and change the number of records to at least 50 to get an extended list
8. The top fifty (50) occupations with the highest estimated annual percent change in openings

Funding/Payment Guidelines

ETC will complete the Individual Training Agreement (HSD 1056) detailing the training provider, program, start and end date and maximum WIOA funding authorized using the following guidelines:

- The limit for ITA contracts is $5,000. The WIB Director may grant exceptions to this cap. To initiate this process the Supervisor must present the exception to the WIOA Program Development Manager who will present it to the WIB Director for consideration
- Only unpaid costs incurred prior to Eligibility will be covered
  - Already paid costs cannot be reimbursed to the client
  - Pro-Rating will not be used to determine costs that will be covered
- Entire program cost will not be paid up front. Required funds needed for the client to start or continue their program may be given for the first payment. ETC and participant will create a breakdown of additional funds needed and a payment schedule.
- The ITA funding can only include the required cost of training services such as tuition, application/registration fees, certifications, permits, licensure fees, books, required materials, physical exams, supplies, uniforms and tools.
- WIOA Priority of Service may apply depending on funds availability

The completed Authorization to Bill (HSD1051) and Textbook and Materials Authorization (HSD1121) are sent to the training provider by the ETC after the Supervisor approves the training proposal. Additional forms may be required based on the training provider. ETC will process all reimbursement/invoice payment requests for an ITA using the Reimbursement Payment Process - Procedure.

ITA Continued Funding

Continued funding of an ITA is contingent on availability of WIOA funds and on the participant's satisfactory progress in school. ETC will review the participant's training progress quarterly or more frequently depending on the training providers schedule. An individual's progress will be considered satisfactory if a 2.0 grade point average is maintained. In the case of ungraded or Pass/No Pass class/program, satisfactory progress means participating in the class/program; receiving a final "Pass" grade; and if applicable, passing certification examinations. If participant has unsatisfactory progress, funding may be withdrawn. ETC will review with their Supervisor on a case by case basis to determine next steps. WIOA funding may not be used to repeat a course, in which the participant previously received a substandard grade

ITA Modifications

In some circumstances an ITA may be modified to ensure the participant attains their educational and employment goals. The Supervisor must approve all modifications to the initial training plan. No modification can be made if the program is removed from the ETPL after the initial ITA approval.

Recovery of Tuition Funds

In the event a participant discontinues training, the ETC must do due diligence to ensure the recovery of WIOA funds provided to training institutions. ETC must verify the following:

- The refund policy of the training provider;
- Percentage of the payment to be returned;
- Turnaround timeframe for the refund; and

- Time spent in training before a refund will no longer be honored.

Documentation
Justification for, and continued funding of an ITA must be supported by the following documentation located in the participant file and/or in case notes entered in CalJOBS:
- Assessments must support the need for training including a determination by an ETC that the participant will be unlikely or unable to obtain or retain employment that leads to self-sufficiency through career services alone
- Assessments supporting the selected program of study
- Completed WIOA Scholarship Application documenting the selected program, training outcomes, anticipated start/end dates, and estimated cost
- Eligibility for another grant funding
- Verification of participants Free Application for Federal Student Aid (FAFSA) award status, if applicable
- Documentation that the training program is in a priority sector for an in-demand occupation, leads to self-sufficiency or advancement, listed on the ETPL and results in a certificate/skill that meets employer needs
- Authorization of the ITA and any approved increase or modification
- Documentation of the participant's progress and/or grades

References:
NPRM 20 CFR 680.600(a)(b)(c), 680.650, 680.110, 680.300, 680.310
WIOA Sec 3(7),(8),(23)&(52)
WIOA Sec 134(3)(A)
WSD 15-14
WSD 21-03
WSD 19-10
WSD 22-15
WSD 22.01
TEGL 19-16
U.S. Code: Title 38 Sec 4215