



BLUE RIDGE REGION

<b>Title:</b> Individual Training Accounts (ITA) Policy	<b>Related Forms:</b> Yes
<b>Effective Date:</b> 1/27/2017	<b>Revised Date:</b> 12/15/2022

### **Purpose**

The purpose of training is to provide eligible participants with the means to obtain the necessary skills to become gainfully employed or re-employed. This policy is intended to define and establish parameters for Individual Training Account (ITA) development and expenditures.

### **Reference**

- Workforce Innovation and Opportunity Act (WIOA) Title I
- VWL 16-06 Change 1 Eligible Training Provider and Programs List
- VBWD Policy 401-04, Change 1 Provision of Training Services
- VWL 20-06 VaWC Services Codes

### **Policy**

A WIOA Title I-eligible participant is enrolled in a training program if the Individual Employment Plan (IEP) supports that the training is necessary to transition the participant into the workforce. The training must support the stated purpose of WIOA Title I and be in accordance with the description of training as contained in the Act. Whenever feasible, training vendors will be requested to allow participants to receive credit for required courses when equivalent courses have been completed and can be documented from other training institutions. Additionally, costs associated with College Level Examination Program (CLEP) Testing will be treated as a training cost if the testing relates to the curriculum of study.

### **Procedure**

#### Eligibility

All recipients of training funds must be eligible based upon criteria established under the Act. WIOA Title I requires the coordination of training costs with funds available under other grant assistance (Section 134). WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources, including PELL Grants, to pay the costs of their training or require assistance beyond that available under grant assistance from other sources, including PELL Grants but excluding loans, to pay the costs of such training to avoid duplication of payment. Individuals must maintain an active application status for PELL assistance. The exact mix of funds shall be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid, and that necessary supportive services are available so that the training can be completed successfully. The total school budget will be supplied by the vendor based upon a formula used by institutions that determine financial aid.

Staff should determine and document clearly the need for training for each participant in both the Individual Employment Plan (IEP) as well as in case notes in the system of record, the Virginia Workforce Connection (VaWC).

### Occupational Areas of Training

The training provided through ITAs is for the sole purpose of facilitating transition into the workforce. All training will be for occupations identified as in demand in the labor market and determined to be of priority by the Greater Roanoke Workforce Development Board (GRWDB) in the Local Plan.

Staff may request a waiver for participants that are interested in training outside of these target sectors and occupations. Waivers must be requested, with all required documentation, and approved by the GRWDB Director prior to approving funding for the participant. Waiver documentation must include, at a minimum:

- Justification within the participant's IEP identifying occupation interest and/or aptitude;
- Barriers to employment and/or training in the target sectors and occupations;
- and Local labor market information including LMI data as well as at least 3 different current job openings paying a self-sufficient wage (as defined in our Eligibility policy) for the occupation connected to the training.
- These items must be attached to the waiver request form to a GRWDB Director. Waivers may be available for no more than 5% of funds budgeted annually by line item and by program (i.e.: 5% of the Adult ITA budget, etc.).

Training funded specifically for Commercial Driver's License (CDL) may not exceed 25% of the total occupational skills training budget, per program, per year. This funding maximum may be exceeded if approved by a Director through a Waiver request ahead of the funds being obligated.

### Training Selection

Training will be provided for priority occupations only as determined by the Board by an institution or organization certified as meeting the criteria and having completed the procedures outlined in the Eligible Training Provider Certification policy. Participants have choice of any approved provider and approved program that is on the statewide ETPL housed within the system of record, VAWC. Approval for local funding, however, will be based on criteria listed within this policy as well as funding limitations within supportive services that may be required for trainings. Participants must complete the Training Plan, acknowledging their choice, and this form must be kept in the participant's program file.

### Length of Training

Training length will vary according to the type of training and the requirements for completion. Because entering or returning to the workforce is a priority under WIOA Title I training, training cannot exceed more than 24 calendar months. Training should lead to an industry-recognized certification and employment that earns a sustainable wage. Participants whose IEP includes training lasting more than 24 months must request a waiver from a GRWDB Director PRIOR to beginning the training and expenditure of funds. Participants whose training was planned for less than 24 months but who require additional time to complete the program of study must request a waiver.

### Repeat Training

The GRWDB will NOT provide funding for courses/programs previously funded with WIOA Title I program funds but not successfully completed.

### Cost Limitation

The local GRWDB limits training cost to no more than \$5,000 per participant within a twelve-month period, except as approved by a GRWDB Director prior to the expenditure of funds via a waiver. Funding of training and supportive services combined may not exceed a total of \$8,000 in a 12-month period. All WIOA registrants will be made aware of any excess cost of training not covered by the program for which they will be responsible. Program staff are expected to work closely with participants to determine the individuals' ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the needs of the participant while using WIOA funding in the most efficient manner possible.

WIOA Title I training funding is always a payor of last resort. This means all other funding sources should be explored for potential payment, prior to WIOA Title I funds being obligated and/or expended for training. Examples may include scholarships, federal financial aid, other private or public grant funding, etc. Furthermore, if a participant chooses a training which has a cost higher than that of the approved ITA limit, the GRWDB does not encourage participants to secure loans to pay the difference. The source of payment for remainder of amount due would be participant responsibility and should be verified PRIOR to obligating or expending WIOA Title I funds.

### Administration

All requests for ITA funding must be supported in the participant's IEP. Contact with the participant is required. All participants are also required to complete performance reviews with their case manager on a quarterly/ semester/module basis in accordance with the timeframes outlined on the IEP. ITA funding is authorized on a semester/quarterly/module basis, when applicable, and requires documentation that the participant has successfully completed previous work. Discontinuation of funding for students who are not performing or demonstrating satisfactory progress toward completion of training goals is allowed. Students are expected to maintain no less than a cumulative 2.0 grade point average for the year to continue to receive WIOA funding. Invoices from training providers must be placed in customer files with vouchers to substantiate payments. Vouchers must have all signature lines successfully signed prior to payments being made. Payment are made to training providers on behalf of an individual participant. Payments are not made to participants directly and are not made as reimbursements for expenses paid by participants prior to program enrollment and/or approval from program operator.

### Waivers

A waiver to the above maximum specifications may be requested from a GRWDB director on a case-by-case basis. Waivers must be submitted and approved by the Director prior to the expenditure of funds. The necessity for waiver must be sufficiently justified and documented for a waiver to be approved.