

CDO WORKFORCE INVESTMENT BOARD

POLICY #07-06: Individual Training Accounts
DATE: April 16, 2008
APPLIES TO: WIA Title I-B Adult, Dislocated Worker and Out-of-School Youth Programs

This policy supersedes all other local policies and CDO Workforce Investment Board resolutions related to Individual Training Accounts.

History

The Workforce Investment Act of 1998 (WIA) establishes training services for enrolled Adults and Dislocated Workers through Individual Training Accounts. WIA Section 134(d)(4)(G) states, "Training services ... shall be provided in a manner that maximizes customer choice in the selection of an eligible provider of such services." The WIA mandates that all training services (except limited exceptions identified in this policy) be provided through the use of Individual Training Accounts (ITAs) and that eligible individuals receive ITAs through the one-stop delivery system.

ITAs are funded with Adult and Dislocated Worker funds. Under the WIA, ITAs are not allowed for enrolled youth customers (customers between the ages of 14-21); however, the WIA does allow that individuals age 18 and over may be eligible for enrollment in the Adult and/or Dislocated Worker programs and may then be eligible for training services under those programs. Additionally as it relates to enrolled youth customers, New York State Department of Labor (NYSDOL) issued Technical Advisory #06-11 which allows local workforce investment areas to apply for a waiver to utilize ITAs for customers enrolled in WIA Youth programs. The CDO Workforce Investment Board (CDOWIB) has applied and been approved to utilize ITAs for enrolled Out-of-School youth.

Purpose

The purpose of this policy is to communicate local policy regarding the expected parameters of Individual Training Accounts for enrolled Adults, Dislocated Workers and Out-of-School Youth, as determined appropriate. This policy and related procedure will ensure that ITAs are administered in a way that will assist an enrolled customer obtaining in-demand skills in order to gain and maintain a greater level of self-sufficiency through higher level employment.

Provision

WIA-enrolled Adult, Dislocated Worker and/or Out-of-School Youth are expected to take an active role in managing their employment future through the use of ITAs. Enrolled customers receiving training services will be provided information they need (e.g., skills assessment results, labor market conditions and trends and training provider performance) to make informed choices about their own employment future and the training to support their decision.

A. Individual Training Account (ITA)

Individual Training Accounts for training services are sometimes necessary to the success of the customer's Individual Employment Plan (IEP) or Individual Development Plan (IDP) for Out-of-School Youth. **Training services are not entitlements** and shall be provided to customers on the basis of an assessment of his/her job readiness, employment and training needs, financial, social and supportive needs, labor market demand and potential for successful completion. The customer's Individual Employment Plan or Individual Development Plan shall provide the justification for all

services to be provided including the appropriate combination of training and other services for the customer to achieve his/her employment goals.

When awarding an ITA, the CDO Workforce One-Stop Career System assumes full financial responsibility (as defined by the IEP or IDP) for the customer, even when training is provided in another jurisdiction. An ITA may be established on behalf of an enrolled Adult, Dislocated Worker or Out-of-School Youth customer to purchase training services from eligible training providers.

Training services are defined as one or more courses or classes that, upon successful completion, lead to:

- A certificate or degree; or
- A competency or skill recognized by employers and the CDO Workforce Investment Board (CDOWIB); or
- Additional skills or competencies generally recognized by employers and the CDOWIB.

Pre-requisite to Skill Training Programs

The NYSDOL has determined that pre-requisite to skill training programs such as adult literacy or basic computer literacy services are not part of the definition of training services under WIA Title I-B. The requirements of Individual Training Accounts do not apply to these services.

Eligible Training Providers

The CDO WIB, in partnership with the NYSDOL, will identify training providers whose performance qualifies them to receive WIA funds to train enrolled Adults, Dislocated Worker and Out-of-School Youth. These include post-secondary educational institutions, national apprenticeship programs, community-based organizations, private organizations and other public or private providers as defined in WIA Section 117(f)(1).

B. Funding ITAs

The funding levels and duration of ITAs or contracts for training services shall be determined on a case-by-case basis and shall be limited to the needs identified in each customer's Individual Employment Plan or Individual Development Plan for enrolled Out-of-School Youth.

When awarding an ITA, consideration will be given to why a customer may need an ITA beyond what other resources may be available such as PELL grants, scholarships, severance pay or other resources. Customers may be unable to obtain grant assistance from other sources to pay for their training or may require assistance beyond what is available under grant assistance from other sources to pay for their training. The customer's IEP or IDP will document how other sources of funding were sought prior to the development of an ITA and provide confirmation of funding application. WIA funds are intended to supplement other sources of training grants. Customers should apply PELL and other available funding resources as soon as a school is selected, upon development of the IEP or IDP and with the approval of the CDO Workforce Training Coordinator.

Funding Parameters

Prior to the Enrollment and Start Date of training, customers will be required to provide a complete list of all costs related to training including, tuition, required textbooks, supplies and required tests for certification to complete training. Parameters of funding are as follows:

- Training will not exceed two (2) years in length;

- The maximum funding level will be based upon the actual cost of the customer's tuition and related expenses, less any financial assistance from other sources, and will not exceed **\$3,000.00**, as defined in **Table 1**;
- Customers will be required to provide copies of the registered class schedule and proof of required textbooks. Textbooks for non-related coursework will not be funded;
- Training programs that exceed the amounts listed in Table 1 may be supported under this policy. However, customers will be responsible to find additional sources including other grants, student loans and/or personal funds to pay for the balance.
- The maximum funding level per ITA may be reduced at the discretion of the CDOWIB if available funding does not reasonably support such expenditures.

C. Satisfactory Progress in Training

Customers are required to make satisfactory progress in training to access all payments of their ITA. Satisfactory progress is defined as follows:

- The customer's grade point average does not fall below 2.0 for more than one consecutive quarter or semester;
- The customer maintains a grade point average sufficient to graduate from or receive certification in his/her approved program or course of study; and,
- The customer is completing sufficient credit hours to finish his/her approved course of study within the timeframe established under his/her approved training plan.

In the case of self-paced or non-graded learning programs, satisfactory progress means participating in classes and passing certification examinations within the timeframe established under the customer's approved training plan.

D. Exceptions to ITAs

The CDO Workforce Investment Board reserves the right to implement the authorized exceptions to the use of Individual Training Accounts in accordance with WIA Section 134. These authorized exceptions include the following:

- Training services provided for on-the-job training or customized training;
- Training service programs of demonstrated effectiveness, as determined by the CDOWIB, offered in the area by community-based organizations or other private organizations to service special populations that face multiple barriers to employment. Special populations that face multiple barriers to employment are populations of low-income individuals that are included in one or more of the following categories:
 - Individuals with substantial language or cultural barriers;
 - Offenders;
 - Homeless individuals; and
 - Other hard-to-serve populations

The CDOWIB's criteria for determining demonstrated effectiveness, particularly as it applies to the special participant population to be served, includes the following:

- Financial stability of the organization;
- Demonstrated performance in measures appropriate to the program including program completion rate, attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment and retention in employment; and

- How the specific program relates to the workforce investment needs identified in the CDO Workforce Investment Board's local plan.

E. Eligible Training Providers

An ITA can only be issued for training provided by an approved Eligible Training Provider that is on the CDOWIB's Eligible Training Provider list or the New York State Eligible Training Provider list found at <http://www.workforcenewyork.org/etp/>.

Customers will have access to the list of eligible providers through the One-Stop Career Center System. Customers will be able to select WIA training services by any eligible training provider from any of the local areas on the state list.

Out-of-State/Out-of-Area Providers

All training programs must be within a reasonable commute (i.e., 50 miles) of the Chenango, Delaware, Otsego area. Out-of-the-area training programs that are not within commuting distance to the local area may be approved on a case-by-case basis pending a customer demonstrating his/her ability to incur all extraordinary costs, e.g., travel and living expenses. All approved training must be located within the contiguous United States and those training providers must be listed on that state's eligible training provider list.

F. Demand Occupations

Consideration must be given to labor market demand in the local area and training will be limited to skills relevant to demand occupations. Training services may be approved for occupations that the CDOWIB has determined to be in sectors of the economy that have a high potential for sustained growth and/or where documentation indicates employment prospects in the local area, in addition to those occupations on the demand list.

G. Registration Time Limit

The customer must register for training on time according to the selected training institution's policy. ITAs will not be used for payment of late fees caused by customer error or delay. The customer will be responsible for these fees, as he/she is responsible for other fines or penalties.

H. Contact with and Reports to Customers

Contact with the CDO Workforce Training Coordinator or other designated One-Stop Career Center staff will occur, at a minimum, on a monthly basis during the lifetime of the training plan to ensure the customer is making satisfactory progress in training.

The CDO Workforce Training Coordinator will provide regular guidance to customers enrolled in approved training programs who have been awarded ITAs.

Guidance will include information deemed relevant/pertinent to the customer by the Training Coordinator.

I. Modified IEP/Subsequent ITA

A customer may only modify his/her IEP with approval from the Training Coordinator. Second and subsequent ITAs can only be awarded to an individual if approved by the Training Coordinator with justification that supports further training is needed in order for the customer to obtain employment.

J. Availability of Funds Disclaimer

Training resources for customers are contingent upon the availability of funds provided by the United States Department of Labor and the NYSDOL.

Table 1

The total program maximum is \$3,000.00 to include the following only: tuition, required textbooks, miscellaneous fees and certification testing.

Fee Category	Description/Explanation
Tuition	The price of or payment for classroom instruction.
Required Textbooks	Textbooks that are used in the study of a subject; NOTE: students will be required to provide a current class schedule and a list of required textbooks each semester.
Miscellaneous Fees	All mandated fees required by a training facility, including immunizations. Additional fees include: <ul style="list-style-type: none"> - Matriculation fees; - Laboratory fees; - Technology fees; - Activity fees; - Application fees; - Health services fees; - Alumni fees NOTE: immunizations will be paid for those students whose curriculum requires the shots, i.e., nursing assistants, therapy aides, medical office assistants, nurses.
Certification Testing	All certification exams required at the end of a course of study to allow an individual to begin employment. This includes DMV exams (for CDL A or B licenses) and Microsoft A+ testing and exams for nurses, teachers and nursing assistants.