



**WORKFORCE INNOVATION AND OPPORTUNITY ACT
(WIOA)
PROGRAM POLICY NOTICE NO. 16, Rev. 1**

EFFECTIVE DATE: MAY 11, 2020

SUBJECT: WIOA INDIVIDUAL TRAINING ACCOUNTS (ITAs)

REFERENCES.

Title I of the Workforce Investment Opportunities Act (WIOA) of 2014; WIOA Regulations; Office of Management and Budget (OMB) cost principles codified in 2 CFR Part 220, Part 225 and Part 230.

PURPOSE.

This policy provides instruction and guidance on the use and administration of individual training accounts for training in demand occupations as identified in the state and local plans.

BACKGROUND.

The Individual Training Account (ITA) is established for eligible individuals to receive assistance financing training services with eligible training providers. It is essentially a voucher given to customers who need occupational skills training to become gainfully employed or re-employed. Under the WIOA Adult and dislocated workers purchase training services from eligible providers they select in consultation with the career development specialist.

Supported by assessment and informed decision-making, customers may use their ITAs to purchase training slots in any program on the eligible training provider list (ETPL). Customers approved for ITA funds can only select from programs on the statewide program/provider list. If a program is not on the list, WIOA cannot pay the cost of attendance.

An ITA will be provided after an assessment of customer needs, present skill levels, and demand occupations. The selection of a training program will occur after consultation with a Career Development Specialist (CDS). The process will be recorded in a career plan called an Individual Employment Plan (IEP).

ACTION.

(A) ITA's:

1. Are required to be Occupations in Demand. Demand occupations will be based upon DWS occupational demand statistics for the NALWDB service area and will include occupations which show at least a 1.2% annual job growth in the NALWDB area as a whole or in either of the two

- Metropolitan Statistical Areas (MSAs) of Farmington and Santa Fe.
2. ITA participants are required to maintain a 2.0 Grade Point Average (GPA) and must provide official documentation of grades to the WIOA case manager at the end of every semester funded. In turn, the WIOA case manager must document GPA/grade verification in a NMWCOS case note. Students falling below a 2.0 GPA will be placed on probationary status for one (1) semester; students failing a second subsequent semester will be removed from the paid classroom activity (ITA). Repeat courses will not be paid for under any circumstances.
 3. Shall be issued only to individuals who have been determined through assessment and their individual employment plan (IEP) to be in need of training services to obtain employment in a demand occupation that will lead to a career path of self-sufficiency. ITAs are not an entitlement; WIOA requires that local boards/service providers develop a priority of service (See NALWDB Program Policy Notice No. 8). Customer choice shall be exercised within the targeted industry and demand occupations designated by state and local board policy. Individuals, eligible or otherwise, that seek training outside of these designated areas can be provided assistance in pursuing other sources of financial aid. If it is determined that WIOA ITA funding is not appropriate for a customer because it is outside of the areas targeted by the state or local board as occupations is demand, centers will assist customers with other financial aid application (i.e., Pell, etc.) and alternative options.

Before an individual is eligible to receive an ITA the need for training, appropriate occupational choice for training and their ability to successfully participate in the chosen training must be established through assessment. A full education and work history as well as a skills determination must be utilized to determine if the individual is employable at a self-sufficient level with skills already in their possession. Individuals that possess the skills to obtain self-sufficient employment in the local area are not eligible for ITA training unless there is a substantiated cause that makes them unable to perform that occupation e.g. injury etc. This information must be included in the case file and utilized in the development of the individual employment plan.

The IEP shall be developed jointly with the participant utilizing the NMWCOS plan and should include information substantiating the individual is able to participate in and complete training. This should include information on how the participant will support themselves while in training. Participants identified to be in need of training must sign a Family Education Rights to Privacy Act (FERPA) release of information authorization allowing the career development specialist (CDS) to obtain information on their financial aid information, grades and attendance information as necessary.

Occupational training counseling should be provided to the participant and documented in case notes in the file. This training should include a review of the local labor market as it applies to the demand occupations. The goal is to train for jobs available or growing in the local area. If the customer wants to participate in training in an occupation is in demand within the Northern Area but not the local economy the participant must sign an acknowledgement that they are willing to relocate to obtain employment in the chosen training category.

Staff will assist customers with accessing the statewide list of eligible training providers and programs from the NMWCOS. The ultimate choice of training provider resides with the customer.

The individual employment plan (IEP) must adhere to time limitations of 104 training weeks for long term ITA's and 52 training weeks for short term training, non-contiguous.

4. Shall be limited to individuals unable to obtain other grant assistance or who require assistance beyond that available from other grant assistance programs and who have been identified on their IEP to be in need of training. The CDS, at each training enrollment period (i.e., semester, quarter), shall document the availability of other funding sources such as Pell grants, Trade Adjustment Assistance (TAA), Temporary Assistance to Needy Families (TANF) or other federal grants. The financial aid office of the training institution shall provide information of need related to cost of attendance and the CDS will utilize this information for the determination of the need for assistance beyond that available from other grant assistance programs. The allowable CAP for ITAs is hereby increased from the current \$5000 to \$7500. Also, under certain circumstances an ITA training CAP of \$10,000 will be allowed if requested in writing from the service provider to the NALWDB Executive Director with appropriate documentation justifying the need for the larger CAP, including that it is an occupation in demand, percentages employed, future employment forecasts, etc.

Unmet need shall be calculated on a line item basis by subtracting grant assistance received from the amount of need supplied by the training institution. This information shall be documented, calculated and recorded on the Cost Sharing Agreement or its subsequent replacement documents. This form must be completed in its entirety for individuals even if no financial aid is available to the individual or for the training program.

When unmet need has been established in the presence of additional funding sources the WIOA share shall be apportioned as follows:

- (a) In the presence of assistance from the NM Lottery or other tuition based scholarships, WIOA funds shall not be expended for tuition unless the cost of tuition exceeds the amount available under the scholarship.
- (b) In the presence of assistance from both Pell and NM Lottery or other tuition based scholarships. Funds will be utilized for books and fees only unless there is a balance of tuition beyond the amount of scholarships. In some instances, tools and/or supplies can be covered by WIOA ITAs, and if meets the definition, supportive services.
- (c) For individuals, eligible for Pell grants only, WIOA funds shall only be utilized for books and fees, unless there is a balance of tuition after the application of Pell and shall be limited to the balance of unmet need.
- (d) For individuals, eligible for TAA, WIOA shall pay supportive services based on NALWDB Policy, limited to balance of unmet need.
- (e) For individuals receiving other scholarships that do not have a defined use then it will be treated like a Pell grant and applied to unmet need so long as the need is sufficient and substantiated. For those students, WIOA will pay tuition, books and fees, and supplies not to exceed the balance of unmet need. Documentation on the scholarship's lack of designation or defined use must be supplied by the student or the financial aid office and included as part of the file.

(f) For individuals receiving other scholarships with a defined use the scholarship MUST be applied to the designated category e.g. tuition, books, uniforms etc. In those cases, WIOA is limited to assistance with balances of the applicable cost category and other assistance as allowed above.

(g) GI Bill availability cannot be counted against veterans eligible for that benefit. It is not to be treated as financial aid for Veterans requesting training assistance or applied toward the balance of unmet need.

(h) Loans do not count as financial aid for the purposes of WIOA assistance and do not apply against unmet need.

All contract documents and forms must be submitted along with the application and eligibility documents to the service provider fiscal office. Also, itemized receipts must be attached to all invoices submitted by training institutions for reimbursement.

5. An ITA contract modification must be completed utilizing the designated local area forms or their subsequent replacements and should be used in any of the circumstances listed below. The modification should include the reason the modification was necessary.
 - (a) When the actual cost of training is more than was anticipated on the original contract
 - (b) To correct training term dates
 - (c) If financial aid is awarded after completion of the contract
 - (d) If there is a class schedule change
 - (e) Any other situation that would make the original contract inaccurate

This should be submitted to the service provider fiscal office upon completion.

6. A de-obligation form shall be completed when the actual costs are less than anticipated on the original contract.

This should be submitted to the service provider fiscal office upon completion.

7. The Financial Claim for Payment (FCP) shall be sent to the One Stop office responsible for the participant after the institutions drop/add period is complete. It will be reviewed for accuracy and completeness and sent to the fiscal agent for payment. Fiscal staff will review the FCP for completeness and accuracy and process for payment.

8. Supporting documentation
 - NALWDB Cost Sharing Agreement
 - NALWDB ITA Contract
 - NALWDB ITA Contract modification
 - NALWDB ITA Contract Training Term Modification
 - NALWDB FCP

This policy rescinds any previous NALWDB policy regarding subject.

INQUIRIES: Contact WIOA Management at 505-986-0363.



NALWDB CHAIR

5-11-20

DATE