

# Southwest Arkansas Workforce Investment Board

## Workforce Innovation and Opportunity Act (WIOA)

Policy Number: SWAWDB – 007	
Title: <b>INDIVIDUAL TRAINING ACCOUNT (ITA) POLICY &amp; PROCEDURES</b>	
Reference: ADWS Policy 3.2; TEGL 21-16; 20 CFR 680 Subpart C	
Effective Date: May 28, 2020	Revision Date: August 27, 2024

### PURPOSE:

This policy outlines Southwest Arkansas Workforce Investment Board Workforce Innovation & Opportunity Act (WIOA) directives for providing Individual Training Accounts (ITA's) for WIOA eligible Adults, Dislocated Workers (DLW), and Youth. Adults, DLWs, and Youth who have met eligibility requirements and have been determined to need training may access financial assistance using an Individual Training Account.

### REFERENCES:

WIOA §§ 122(h) & 134(c)(3)(G)  
20 CFR 679.560(b)(18)  
20 CFR 680, Subpart C  
20 CFR 680.230 & 680.750  
TEGLs 19-16, 21-16, 3-18, & 8-19  
ADWS Issuance PY19-09

### BACKGROUND:

Except in specific circumstances listed in WIOA § 122(h), WIOA § 134(c)(3)(G)(ii), 20 CFR 680.320, TEGL 19-16, and TEGL 8-19, Occupational Skills Training is provided for a WIOA title I Adult, Dislocated Worker, or Out-of-School Youth through an individual training account (ITA) that is used to purchase training from an Eligible Training Provider [*WIOA § 134(c)(3)(G)(i); TEGL 19-16; TEGL 3-18; TEGL 8-19*]. **(ITAs cannot be provided to In-School-Youth unless the youth also qualify for and are co-enrolled as an Adult [20 CFR 681.550; TEGL 21-16]).**

An ITA is an agreement established by a WIOA title I service provider with a training provider to pay certain required costs on behalf of a participant. It may be written for any allowable type of program of study that is on the state eligible training provider list (ETPL) and has been approved by the local workforce development board (LWDB). Any payments to be made **directly to the training provider** must be listed on the ITA, whether the payments are for direct training costs or supportive services (such as books, supplies, and fees).

Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments may also be made incrementally, such as through payments of a portion of the cost at different points in the program of study [*20 CFR 680.300*].

### POLICY:

The policy must be consistent with the information in the local plan concerning how training services will be provided, the limits to be imposed, if any, and any other ITA information in the local plan [*20 CFR 680.310*].

**Individual Training Accounts are established on behalf of a participant who a Career Planner determines, after an interview, evaluation, or assessment, and funds are limited to participants who:**

- Complete an assessment that:

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- Identifies a need for training that leads to self-sufficiency or wages comparable to or higher than wages from previous employment, and
  - Demonstrates the participant has the skills and qualifications to successfully complete the training program.
  - Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services
- Complete an Individual Employment Plan (IEP) or Individual Service Strategy (ISS) that identifies the selected training program with anticipated start and end dates.
- Are unable to obtain grant assistance from other sources to pay the costs of training or required assistance beyond available grant resources from other sources, such as Pell Grants, Career Pathways, or Trade Adjustment Assistance (TAA), in order to complete training goals.
- Select training programs that are:
  - Included on the Eligible Training Provider List, and
  - Directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area or in the planning region or in another area in which the participant is willing to travel or relocate; and
- Maintain satisfactory progress/grades throughout the training program.
  - Participants who have had previous post-secondary coursework must present a transcript that shows a cumulative grade point average of 2.0 or higher to receive Training Services and be issued an ITA

**The above documentation must be placed in the participant's record file.**

### **A. ITA Agreement**

Participants must select trainings from training institution and program listed on the ETPL.

- a. Participants must agree to select a training from training institutions and programs listed on the ETPL.
- b. Participants may select trainings that cost more than the maximum amount available for ITAs when other sources of funding are available, and the balance remaining does not exceed the total amount allowed for WIOA ITAs

### **B. The procedure for issuing an ITA, including who is authorized to issue an ITA**

- a. The Career Planner, after determining that a participant is eligible for an ITA, and funds are budgeted, will complete the proper paperwork and submit it to the Accounting Staff and/or Program Manager for approval. The Career Planner is authorized to issue an ITA to the eligible training provider after approval.
- b. If training costs are fully covered by other sources, and no WIOA title 1-B payments are to be made directly to the training provider, then an ITA is not needed.
- c. An ITA may be issued for participants who possess a credential, certificate, or a degree (other than degree higher than a bachelor's degree) if the participant is determined to be eligible for Training Services and a need for additional training has been established. The need for additional training will be determined by:
  - i. Evidence of extensive job search that has been unsuccessful in the career path of the credential
  - ii. Physician's statement that the participant can no longer work in the career path of the credential held due to legitimate medical reasons
  - iii. Documentation that the credential held is outdated or that the participant has not maintained a proficiency in that career path due to not having a substantial work history in that occupation

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- iv. The credential is not on the in-demand occupation list for Southwest Arkansas or the State of Arkansas
- d. Participants who have selected a bachelor's degree program must complete the first two years of training, prior to being eligible for an ITA
- C. The maximum amount of funding of an ITA for a participant [20 CFR 680.310]**

ITAs are designed to be flexible and facilitate the payment for a training program that best meets the participant's needs and interest.

  - a. The maximum amount of funding of an ITA for each participant is limited to the total dollar amount of \$15,000. The total of all individual ITAs for a participant may not exceed this amount. Participants who receive financial aid such as the Pell Grant or other scholarships or grants are expected to use these funds for tuition, fees, books and other training required fees.
  - b. Participants may enroll in ITA funded training while eligibility applications for Pell Grants and other scholarships are pending. Typically, an ITA is not issued/written until proof of Pell Grant awards has been established, however, if this does occur there is a statement on the ITA form that reads: **Training provider, please note that WIOA is required to be the last source of funding. If the student receives any non-loan financial aid after WIOA has paid, per 20 CFR 680.230, reimbursement must be made to WIOA for the amount paid before any refund is disbursed to the student.**
- D. Maximum duration of an ITA [20 CFR 680.310]**
  - a. Southwest does not place a maximum duration of an ITA. Southwest does reserve the right to limit an ITA for an individual participant that is based on the needs identified in the IEP, such as the participant's occupational choice or goal and the level of training needed to succeed in that goal.
- E. Limits on the number of ITAs a person may receive**
  - a. Southwest does not place a limit on the number of ITAs a person may receive. However, the total of all individual ITAs must not exceed \$15,000. Southwest does not provide assistance beyond a bachelor's degree, this includes those who apply for assistance and already have a bachelor's degree or it's equivalent, in an in-demand occupation.
- F. Limits in the amounts or duration of ITAs based on the type of credential [20 CFR 680.310 (b)(1)]**
  - a. Southwest does not place a limit on the duration of an ITA based on the type of credential. However, there is a limit on the total dollar amount of all ITAs not to exceed \$15,000.
- G. Limits on the amounts or duration of ITAs (individual or total) specified by program of study**
  - a. Southwest does not place a limit on the duration of ITAs (individual or total) specified by program of study. However, there is a limit on the total dollar amount of all ITAs not to exceed \$15,000.
- H. Limits on the number of times an individual may modify an ITA and any conditions under which a person may modify the ITA**
  - a. Southwest does not place a limit on the number of times an individual may modify an ITA
  - b. ITA may be modified to ensure the participant attains their educational goals and subsequent employment. In some circumstances, such as a program of training is removed from the ETPL, or when extraordinary program expenses develop, the participant and career planner must agree on whether to complete the plan of training with the existing provider, seek a similar program or discontinue training.
  - c. When a program of training is removed from the state ETPL, WIOA participants in that program can complete their training. However, an ITA should not be modified or extended for a participant beyond the original plan approval as it relates to a program of training that

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is no longer on the ETPL. Southwest will use discretion in determining and authorizing the amount of ITA modification to use in this case and any modifications must be documented in case notes.

### **I. ITA continued funding, satisfactory progress**

- a. Continued funding of an ITA is contingent upon availability of WIOA funds and on the participant's satisfactory progress in school, except for good cause. Service Provider must review the participant's training progress and expenses quarterly or more frequently depending on the training institution's schedule. A participant's training progress will be considered satisfactory upon earning:
  - A grade point average that does not fall below 2.0 for a cumulative or semester total
  - A grade point average sufficient to graduate from, or receive certification in, the individual's approved area of study, or
  - Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.
  - In case of self-paced or ungraded learning programs, satisfactory progress means participating in classes and passing certification examinations within the timeframe established under the approved training plan.
  - Career Planners must arrange to receive training progress reports, (i.e. transcripts) from participants in adequate time to process the subsequent tuition payment. Progress reports, transcripts or other training-issued updates must be documented in the participant record.
  - Participants with a cumulative or semester GPA below 2.0 will be placed on probation.
  - Career Planners, in collaboration with participants, must develop a service strategy to overcome barriers impacting progress for participants who are not earning satisfactory progress in their coursework. WIOA ITA funding may be terminated if participants do not earn satisfactory progress for two (2) or more consecutive school terms (i.e. quarters, semesters, etc.).
  - Excessive absences should be reported and addressed immediately.
  - Participants that fail or do not complete a WIOA funded class/program, are not eligible to receive funding for the same class/program again (except for good cause) without prior approval from the Program Manager and Executive Director.
  - Participants must be a full-time student and cannot change degree plans without prior written approval by the Program Manager. Degree plans must be strictly adhered to regarding full-time status, unless required classes are not available to remain full-time. Should a participant choose to take additional hours that are not part of their degree plan, the ITA will only cover the required classes being offered. Changes to program and/or degree plan without prior approval will void the issued ITA for payment. Any changes needed for an ITA must be discussed with the Career Planner and approved by the Program Manager.
  - Good Cause – “Good Cause” for failure to make satisfactory progress in training includes specific factors that would cause a reasonable prudent person in similar circumstances to fail to make satisfactory progress. Good cause includes, but is not limited to:
    - Illness, injury or disability of the participant or a member of the participant's immediate family.

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- Severe weather conditions or natural disaster precluding safe travel
- Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant
- Acting on advice received from an authority such as the training provider, instructor, or case manager
- Training is delayed or cancelled
- Accepting stop-gap employment with hours or other work conditions that conflict with the training, or
- Accepting goal-related employment prior to completion of training.

**J. Withdrawal from Courses/Changing Curriculum:**

- a. Participants who wish to withdraw from courses should first check with their academic and career advisor. Participants must officially withdraw through the Service Provider's process and should be done by the deadline set forth by the service provider to avoid a failing grade and possible charges and penalties. Any refunds that may be eligible should be refunded to WIOA, if WIOA funds were used. Career planners are responsible for following up on this process.

**K. The policy must describe how informed customers choice in the selection of training programs will be ensured, in accordance with the local plan [20 CFR 679.560(b)(18)]**

- a. Southwest will provide the list of Eligible Training Provider List and/or details on how to access the ETPL through the ARJobLink system to all participants to ensure that customers choice is being provided.

**L. The policy must describe how ITAs will be used to support placing participants into registered apprenticeship programs, if ITAs will be used this way. If ITAs will not be used to support registered apprenticeship programs, the policy must specify how the occupational skill portion of registered apprenticeships will be supported [20 CFR 680.330 & 750]**

- a. Individual Training Accounts (ITA) can be used to fund the related classroom instruction component of an apprenticeship program, as long as the apprenticeship program or the education/training provider for the apprenticeship program is on the ETPL. ITA funds can be used in combination with on-the-job training funds to support WIOA participants in apprenticeship.

**M. The policy must specify that all payments to the training provider will be paid through the ITA when an ITA is determined to be appropriate for the training to be provided**

- a. Southwest will make all payments to the training provider through the ITA when an ITA is determined to be appropriate for the training to be provided.

**N. The policy must include information regarding coordination of funding with other entities as appropriate. WIOA funds must *supplement* other sources of training grants. WIOA Title 1-B training funds must always be the *final*, not the first, resort for funding training.**

- a. WIOA Service Providers must consider the availability of other sources of funding first, excluding loans, to pay for training cost so that WIOA funds are used to supplement but not supplant other sources. WIOA funding is limited to participants who are unable to obtain grant/scholarship assistance from other sources or require assistance beyond that available under grant/scholarship from other sources.
- b. As stated in WIOA Final Rules, page 56121 and TEGL 19-16, Department of Veterans Affairs benefits for education and training services are **not included** in the category of "other resources of training grants" listed in 20 CFR sec. 680.230(b). Therefore, veterans and spouses are not required to first use any available benefits entitlements associated

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with their military service before being considered eligible for WIOA funds for training, and Service Providers are not required to consider the availability of those funds.

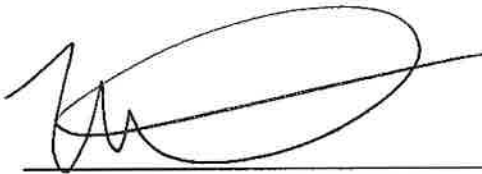
- c. Staff are required to review each ITA for compliance related to tuition/fees and ensure that no duplication of services. Staff will work with the training providers' financial aid office to ensure that funds do not exceed the cost of attendance and/or duplicate costs. Staff will seek and refer other sources of funding to encourage co-enrollment with other agencies. This may consist of referrals to appropriate agencies, institutions, and assistance in applying for other funding sources. Documentation such as scholarship awards, Pell grant award letters, and other awards must be submitted to staff when received by participant/Service Provider. The participant will incur all other costs.

**O. The policy must specify that the following information will be provided to interested individuals:**

- i. **The Eligible Training Provider list of appropriate providers for the training desired, along with performance information concerning these providers, and**
- ii. **Information concerning the limits in general, for specific credentials, and for specific programs, if any.**

The ETPL list and/or link to list will be provided to the participant as either a paper copy or an email as well as the performance information concerning these providers.

Exceptions to any of the above can be made by the Executive Director.



Whitney Peterson, SWAWDB Chairman



Date