



BURLINGTON COUNTY WORKFORCE DEVELOPMENT BOARD INDIVIDUAL TRAINING ACCOUNT (ITA) POLICY

DATE: September 2022

PURPOSE

The Burlington County Workforce Development Board, as the Governor's chosen administrative entity for the Workforce Innovation and Opportunity Act in Burlington County, is authorized to issue interpretations and exceptions as supported by applicable law, rules, and regulations of the Workforce Innovation and Opportunity Act (WIOA).

The purpose of this policy is to establish criteria by which the provision of Individual Training Accounts (ITA) will be issued to customers seeking training in the WIOA Adult and Dislocated Worker programs.

BACKGROUND

WIOA Title I training services for WIOA eligible Adults and Dislocated Workers are provided through Individual Training Accounts (ITAs). Using ITA funds, WIOA eligible Adults and Dislocated Workers purchase training services from eligible training providers they select in consultation with a WIOA Title I Education and Training Counselor. Customers are expected to utilize information such as skills assessments, labor market conditions/trends, and training provider performance, and to take an active role in managing their employment future through the use of ITAs.

POLICY

ITA funding is limited to customers who:

- Complete an assessment that:
 - Identifies a need for training that leads to self-sufficiency or wages comparable to or higher than wages from previous employment, and
 - Demonstrates the customer has the skills and qualifications to successfully complete the training program.
- Complete an Individual Employment Plan (IEP) 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 require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals.
- Select training programs that are:
 - Included on the New Jersey 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 customer is willing to travel or relocated.
- Maintain satisfactory progress/grades throughout the training program.

The above documentation must be placed in both the customers electronic and hard files.

A. Coordination of WIOA Training Funds and Other Federal Assistance

WIOA Career Services Providers must consider the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. WIOA funding for training is limited to customers who are unable to obtain grant assistance from other sources to pay the cost of their training. In making the determination, the full cost of participating in the training services, including the cost of supportive services and other appropriate costs may be considered.

As stated in WIOA Final Rules, page 56121 and TEGL 19-16, Department of Veteran 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 their spouses are not required to first use any available benefit entitlements associated with their military service before being considered eligible for WIOA-funded training, and Service Providers are not required to consider the availability of those funds.

WIOA Career Service Providers must consider and document in the customers file the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. The use of WIOA funds to make payments towards a personal loan of an otherwise eligible customer is prohibited. However, the mere existence of a federal loan, regardless of status must not impact ITA eligibility determinations.

WIOA Career Service Providers must document the availability and coordination of other training funds in the customer files.

B. ITA Authorization

ITAs must be approved by a WIOA Career Services Provider authorized representative prior to issuance. ITA authorization must be documented in the customer's files.

ITAs are authorized only for training programs listed on the New Jersey Eligible Training Provider List (NJETPL), as required in WIOA Section 134(C)(F)(iii). ITA funds are paid directly to the training provider.

ITAs may be used for pre-apprenticeship programs however, only pre-apprenticeship programs listed on the NJETPL may be approved.

ITAs may be authorized for training programs in other states or online training if the training program is listed on the NJETPL and the ETPL of that state or if a reciprocity agreement exists with other states.

C. Funding Mechanisms other than ITAs

Mechanisms other than ITAs may be used to provide training services that do not rise to the level of occupational skills training, including individualized services such as workforce preparation activities or short-term prevocational services. WIOA Sections 134 (d)(3)(C) and 134(d)(3)(C)(vi) describe these services. Individualized services may include literacy, internship, work experience and other training activities that may not provide formal occupational skills training or be appropriate for an ITA.

Similarly, short-term prevocational services are designed to prepare a customer for work but do not provide formal occupational skills training. As such, ITAs are not authorized for individualized short-term prevocational training. Short-term prevocational training may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct or other non-occupation specific topics that are intended to prepare individuals for unsubsidized employment or training. Short-term prevocational training should not exceed 40 hours of instruction except in documented special circumstances.

20 CFR 680.320 provides additional guidance regarding exceptions to the use of ITAs.

D. ITA Funding Limit

The ITA funding limit is \$6,000.00 for tuition. WIOA Title I Career Services providers have the authority to include testing, credential, and/or certification costs depending on the customer's need. These costs are a one-time payment and must be clearly outlined in both the addendum to the ITA and on the NJETPL. Documentation of need must be included in the customer's file and recorded in the case notes of AOSOS.

The maximum ITA limit is NOT an entitlement. The amount and duration of each customer's ITA award is determined on an individual basis. Funding amounts will take into account the total costs of the selected training program, any other financial assistance available to the customer, and the WIOA funding available to the Adult and Dislocated Worker programs. Participants may select training programs that cost more than the maximum authorized limit when other sources of funds such as Pell Grants, scholarships, severance pay, or other resources are available to supplement the ITA.

The ITA must include all costs of training services such as instructor costs, classroom space, instructional materials, academic fees, educational testing and certifications, tuition, books, individual materials, supplies, tools, and equipment.

E. ITA Continued Funding, Satisfactory Progress

Continued funding of an ITA is contingent on the availability of WIOA funds and on the customer's satisfactory progress in the training program, except for good cause. The customer's progress is reviewed and monitored monthly with the submission of the training provider's monthly invoice. A customer's training progress will be considered satisfactory upon earning:

- A grade point average that does not fall below a B.
- A grade point average sufficient to graduate from, or receive certification in, the individual's approved area of study.
- Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.

- In the 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.

WIOA Title I Career Services providers must arrange to receive training progress reports and/or transcripts from vendors in adequate time to process ITA payments. Progress reports, transcripts or other training-issued updates must be documented in the customer's records.

WIOA Title I Career Services providers, in collaboration with the customer, must develop a service strategy to overcome barriers impacting progress for customers who are not earning satisfactory progress in their coursework. WIOA ITA funding may be terminated if a customer is not earning satisfactory progress for two (2) invoice cycles.

Good Cause – “Good Cause” for failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress. Good cause includes, but is not limited to:

- Illness, injury, disability of the customer or a member of the customer’s immediate family.
- Sever weather conditions or natural disaster precluding safe travel.
- Destruction of the customer’s school records due to a natural disaster or other catastrophe not caused by the customer.
- Acting on advice received from an authority such as the training provider, instructor, or counselor.
- Training is delayed or cancelled.
- Accepting stop-gap employment with hours or other work conditions that conflict with the training.
- Accepting goal-related employment prior to completion of training.

F. ITA Modifications

An ITA may be modified to ensure the customer attains their educational goals and subsequent employment. In some circumstances, such as when a program of training is removed from the ETPL, or when extraordinary program expenses develop, the participant and counselor must agree on whether to complete the plan of training with the existing provider, seek a similar program, or discontinue training.

When a program of training is removed from the NJETPL, 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 is no longer on the ETPL. WIOA Title I Career Service Providers must use discretion in determining the amount of ITA modifications to authorize. Any modifications to the ITA must be documented in case notes in AOSOS.

G. ITA Obligations

In order to obligate ITA funds, the customer information and obligation amounts identified on the ITA must be forwarded to the fiscal analyst. The obligation would document a three-way commitment between the customer, the WIOA Title I Career Services provider, and the training vendor. All expenditures must be billed monthly by the training vendor.

H. Recovery of Tuition Funds

In the event a customer discontinues training, the counselor must demonstrate due diligence to ensure the recovery of WIOA funds provided to training institutions. Counselors must demonstrate the following:

- The refund policy of the training provider for early termination from the training program.
- A requirement for the training provider to notify the counselor of early customer dropout.
- The percentage of the payments to be returned.
- Turnaround timeframe for the refund.
- Time spent in training before a refund will no longer be honored.

I. Documentation Requirements

The following must be included in the customer record and documented in case notes in AOSOS:

1. Documented assessment results that justify the need for training and includes evidence of:
 - The customer has the skills and qualifications necessary to successfully complete the training program. AND
 - The customer is unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone.
2. Evidence the selected program of study will result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.
3. Evidence the selected training program is 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 with the customer is willing to travel or relocate.
 - If applicable, documentation of the customer's willingness and ability to travel to locations outside of Burlington County if the selected training program and/or demand occupation is outside of Burlington County must be documented in case notes and on the IEP/ISS.
4. Completed IEP documenting the selected program of study, anticipated and actual start/end dates and training outcomes.
5. Evidence the customer is unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals.
6. Verification of FAFSA or other financial award status, if applicable.
7. Evidence the selected training program is on the Eligible Training Provider List (ETPL).
8. Authorization of the ITA and any approved increase or modification.
9. Copies of transcripts, grades, progress reports or other documentation providing evidence of participant's satisfactory progress training.
10. Training outcome. This includes:
 - If applicable, reason for the participant's discontinuation of training and the change in service delivery as a result of this decision.
 - Copy of degree, certificate, or other evidence of satisfactory completion of training.

REFERENCES

- WIOA Sec. 129 and Sec. 134
- 20 CFR 680.230, 680.300, 680.310 (d), 680.320, 680.330
- 20 CFR 681.550