



WIOA Individual Training Account Policy

Policy Memorandum 16-02, **revision 1**

Date: April 14, 2021

To: All WIOA Service Providers

Purpose: To provide guidance to contractors (service providers) utilizing Individual Training Accounts (ITAs) to provide training services for eligible clients.

Rescissions: ITA Policy 16-02, 6/8/2016

References: WIOA Section 134; Employment and Training Guidance Letter WIOA, No.3-15; 20 CFR 680.210; 20 CFR 680.230; 20 CFR 680.340; Employment Development Department (EDD), Workforce Services Directive 15-07, November 10, 2015, WIOA Eligible Training Provider List—Policy and Procedures; EDD, Workforce Services Directive 18-10, January 31, 2019, WIOA Training Expenditure Requirement

Background:

WIOA authorizes three types of “career services” for adults and dislocated workers: basic career services, individualized career services, and follow-up services. These services can be provided in any order; there is no sequence requirement for these services. WIOA service providers must determine WIOA eligibility to be able to receive assistance from the adult or dislocated worker programs.

The Workforce Innovation and Opportunity Act further provides that training services be focused on occupations for which a demand for trained workers exists or is forecast to occur in the future. Section 134(c)(3)(A) of the Workforce Innovation and Opportunity Act of 2014 references:

“Training services ... directly linked to occupations that are in demand in the local area, or in another area to which an adult or dislocated worker receiving such services is willing to relocate. In alignment with the WIOA key reform principals, and service requirements, statistical information on industry and occupational projections must be provided and given strong consideration when determining training.”

Policy:

A. Local Guidelines for Training Services

1. In accordance with WIOA, if available, other funding sources (non-WIOA) will be utilized as the first source of payment for training programs. This includes but is not limited to Pell grants, Board of Governor’s Enrollment Fee Waiver (BOG), scholarships, and others.
2. ITAs will be capped/limited to **\$10,000** for the duration of WIOA enrollment. The **\$10,000 does not** include the cost of Supportive services. The maximum supportive services amount for the duration of enrollment is listed in the local Supportive Services policy.
3. If similar training (curricula and timeframes) is available at both public and private training institutions, the local WDB will only pay up to the cost of training at the public training institution. The WIOA participant could opt for the private school but would only receive an ITA for an amount equal to the Public School’s cost.
4. The standard training is considered to be one year. Maximum training time will be 2 years. In instances where training extends over a two-year period, WIOA staff will prepare one

- voucher to reflect the total cost of the training that is to be committed. Vouchers should be submitted for the training and supply costs outlined by the institution such as Cabrillo.
5. ITAs and On-The-Job Trainings (OJTs) can be combined as long as total funding stays below a **\$10,000** cap.
 6. The maximum amount for an ITA will be paid for sector occupations including health care careers, construction, and the retail sub sector of trade transportation and utilities sectors for occupations linked to in-demand employment opportunities on the Priority Occupations List. ITAs can be written for unlisted occupations that will be paid at \$3,500 maximum.
 7. Service Provider staff will inform and facilitate career decisions. However, the customer retains the choice to access training for WDB-approved demand occupations from any ITA-eligible training provider on the statewide eligible training provider list.
 8. ITAs are valid for a period of one semester, one quarter or the equivalent division of training from the date of issuance. ITAs are renewable based on successful completion of each training period, funding availability and continued occupational demand.
 9. The WIOA Service Provider must input the required information into the State's CalJOBS system for all ITA activity.
 10. The WIOA Service Provider is responsible for completing the training agreement, obtaining progress reports, assisting clients with placement in a job, and conducting follow-up. WIOA Service Providers must maintain contact with clients to help assure successful participation and completion. Case-notes are required to be updated in CalJOBS on a monthly basis at minimum throughout the training period to document program progression.

B. Eligibility for Training

There is no sequence of service requirement for career and training services using WIOA funds for the provision of occupational classroom training.¹ Under WIOA, training services may be provided if after an interview, evaluation or assessment, and career planning. That the individual:

1. Is 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 alone;
2. Is in need of training services 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 alone;
3. Has the skills and qualifications to successfully participate in the selected program of training services

C. Eligible Training Provider List

The intent of the Workforce Innovation and Opportunity Act (WIOA) is to allow job seekers, who are eligible to receive training services, freedom of choice in selecting a training program from the State's Eligible Training Provider List.

California's Eligible Training Provider List (ETPL) was established in compliance with the Workforce Investment Act (WIA) of 1998 and amended by the Workforce Innovation and Opportunity Act (WIOA) of 2014 to provide customer-focused employment training resources for adults and dislocated workers. Training providers who are eligible to receive Individual Training Accounts

¹ WIOA Section 134 (c) (3)

(ITAs) through WIOA Title I-B funds are listed on the ETPL. The WIOA ETPL Policy and Procedures issued in November 2015, governs the operation of the ETPL in California.

California's statewide list of qualified training providers offers a wide range of educational programs, including classroom, correspondence, online and apprenticeship programs.

D. Demand Occupations

All training services supported through the Santa Cruz County Workforce Development Board must be directly linked to occupations that are in demand in the local area, or in another area to which an adult or dislocated worker receiving such services is willing to relocate. Exceptions may be granted on a case-by-case basis.

Occupations in demand of skilled workers or occupations in industries with a sustained high demand or growth are defined by the Santa Cruz County Workforce Development Board. This information is periodically updated and released through the attached Priority Occupations List (Demand Occupation List).

E. Exception to policy

Under special circumstances, on a case-by-case basis and with proper justification, WIOA Service Providers could request a waiver to exceed the **\$3,500** from the WDB Sr. Analyst and with approval from the Workforce Development Board Director.

WIOA Service Providers should submit an ITA Policy Exception Memo (Attachment II) with the explanation and justification (ie. labor market information) for the exception.

F. Individual Training Account Payment Timeframes

Individual Training Account voucher payments will be made in two separate installments for all private, for-profit training vendors as follows:

- Enrollment Payment= 50% of Total
- Midpoint Payment = 50% of Total

For the initial payment, WIOA enrollment and training vendor enrollment must be verified.

For the midpoint invoice payment, the participant must have completed 50% of the course hours and a corresponding progress report should be included with the invoice. The progress report must indicate that the training midpoint has been reached. WIOA staff must make a verifiable case note entry in Cal JOBS to correspond to this information.

G. Priority of Service Policy

WIOA Service Providers will implement the WDB's *Priority of Service Policy* for designated populations of WIOA customers/applicants for those interested in individualized career services and training services.

H. Supportive Services

WIOA Service Providers will arrange for supportive services during training and employment to eliminate barriers and improve retention according to the WDB's *Supportive Service Policy*. This may include work clothing, tools, childcare, finger printing, and transportation assistance. The need for supportive services will be documented in the Employment Plan or Career Advancement Plan, as well as Cal JOBS case notes. The need will be revised as needed. Supportive services are paid based on an approved invoice and backed up by receipts and/or provider signatures. Using the Commit and Pay (CnP) system, WIOA Service Providers will track Supportive Service amounts authorized and stay within budget allocation and the WDB *Supportive Service Policy*.

Supportive Services claims will be submitted on a monthly basis but no later than 30 days after the conclusion of the training activity.

Action: All WIOA Service Providers shall comply with the attached ITA policy. This policy memorandum is on-going and effective immediately.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director.

Attachments:

- I. Priority Occupations List (Demand Occupations List)
- II. ITA Exception Memo

This policy authorized by: Workforce Investment Board, June 8, 2016 ;revised by Workforce Development Board on May 26, 2021