



SUBJECT: Western Oklahoma Workforce Development Board Individual Training Account Policy

PURPOSE: To establish Western Oklahoma Workforce Development Board's (WOWDB) policy for the Individual Training Account (ITA) to comply with Oklahoma Workforce Development Issuance (OWDI) # 19-2017.

BACKGROUND: The Workforce Innovation and Opportunity Act of 2014, in §134(F) establishes the requirement that "training services...shall be provided in a manner that maximizes consumer choice in the selection of an eligible provider of such services," and further establishes, in §134(G)(i) that "training services shall be provided through the use of individual training accounts...and shall be provided to eligible individuals through the one-stop delivery system."

Training services must be linked to occupations that are in demand in the local area or in another area to which an adult or dislocated worker (DLW) receiving services is willing to relocate. Training services shall be limited to individuals who are unable to obtain other grant assistance, including Federal Pell Grants or require assistance beyond the assistance made available under other grant assistance programs.

POLICY:

- A. This policy applies to any customer enrolled in the WIOA Adult, Dislocated Worker, Out of School Youth receiving training through an ITA.
- B. **INDIVIDUAL TRAINING ACCOUNTS** - ITAs will be developed and awarded to all eligible participants. The ITA will inform the participant of the amount of WIOA financial support that WOWDB will make available on his/her behalf, inform WOWDB and the service provider which eligible training provider and demand occupation the participant has selected for training, and inform WOWDB and the service provider of the beginning and end dates of the training program. Additionally, the ITA outlines the participant's responsibilities to the WIOA program and WOWDB. Any returning participants being enrolled in a WIOA funded program must have board approval for a second ITA.
 1. Exceptions to use: There are five exceptions to the use of an ITA for WIOA training:
 - a. When services provided are on-the-job training or customized training;
 - b. When WOWDB determines that there are an insufficient number of eligible providers in its area to accomplish the purpose of a system of ITAs; and
 - c. When WOWDB determines there is a community-based or other private organization with a training program that serves special participant populations with demonstrated effectiveness.
 - d. When WOWDB enters into a pay-for-performance contract consistent with Sec 683.510.
 - e. When WOWDB determines that it would be most appropriate to contract with an institution of higher education or other eligible provider of training series which will facilitate the

training of multiple individuals in in-demand industry sectors occupations, provided that the contract does not limit consumer choice.

The development of an ITA is not necessary when the participants are TAA funded.

2. Development

- a. WOWDB ITAs will be awarded to participants to provide the costs of tuition, fees, books and other training-related costs associated with participating in a program of training or education funded in whole, or in part, by WIOA funds. The ITA will be established only for the training and training-related costs specifically required by the eligible training provider and paid to the training provider. Any authorized WIOA training-related cost for goods or services not available or provided through the training provider will be requested and paid for as a WIOA supportive service in accordance with the local supportive service policy. Any returning participants being enrolled in a WIOA funded program must have board approval for a second ITA.
- b. WIOA Title I case managers provide an orientation explaining WOWDB's ITA policy to customers of the one-stop center. The policy and procedures will be explained in simple language to promote customer understanding. During the IEP or ISS development process counselors/case managers and the individual will review WOWDB's commitments and what is expected of participants awarded an ITA. Participant expectation and the ITA guidelines are provided in OWDI #19-2017 along with the other WOWDB forms needed to complete an ITA.

3. Customer Choice

- a. ITAs will only be developed for training programs that are related to a demand occupation or are related to the training or education requirements of an industry sector identified by WOWDB as vital to the area's economy or those in another area in which the individual is willing to relocate.
- b. WOWDB's Demand Occupation List is available in Oklahoma Works Centers and skills required of those occupations are discussed with the participant during the development process of an IEP. Training is for demand occupations only.
- c. WOWDB ITA's will only be used for schools or institutions on the State Eligible Training Provider List. A customer who has been determined eligible for training services may select any provider from this list after consultation and joint agreement with the WIOA counselor/case manager. The State Eligible Training Provider List is published on the Oklahoma JobLink website (www.oklahomajoblink.com) and is easily accessible at all Oklahoma Works Centers or from any computer with internet access.

4. Coordination of Training Funds

- a. Funding for training using WIOA funds is limited to individuals who:

- (1) are unable to obtain grant assistance from other sources to pay the costs of their training. Veterans' Administration Educational Benefits and Loans are excluded.
Or
 - (2) require assistance beyond available grant assistance or from other sources to pay the costs of training. WIOA counselors/case managers will document WIOA and other funding sources, except loans, available to WIOA participants on the Coordination of Training Funds (COTF) form provided in OWDI #19-2017 or current guidance. The amount of WIOA training and supportive service funds added to the other funds available will not exceed the total cost of attendance for the corresponding period of training, as indicated on this form by a financial aid officer or equivalent employee of the training institution. WIOA staff may make revisions or additions to the information on the COTF that has been provided by the financial aid office in the event that cost of living or other allowable training expenses are not documented or miscalculations have been made. A detailed program note documenting the reason for the revision or addition should be entered in OSL. WIOA counselors/case managers will ensure that local ITA and supportive service limits are not exceeded.
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- b. If the COTF indicates that the training provider is not Pell-eligible, supportive services may be authorized on a case-by-case basis by the WIOA service provider in excess of the unmet financial need indicated on the COTF. This would allow participation in WIOA occupational skills training. The amount authorized for supportive services for WIOA participants – Adult, Dislocated Worker, Youth or National Emergency Grant - in this circumstance will not exceed \$2,000.00 per ITA or the amount of the unmet need whichever is less.
 - c. WIOA funding may only be applied as supplemental funding and must be coordinated with other potential funding sources. Other funding sources may include wages earned by the customer through employment while attending training. The COTF will be used to document funding coordination and verification that WIOA funds were used as supplemental funding. The COTF is used to determine that all the customer's training-related financial assistance needs are being met. WIOA counselor/case manager staff utilizes the information on the COTF to accurately record the customer's needs and mix of funding assistance on the Oklahoma ServiceLink.
 - d. The customer will authorize the release of his/her financial aid information by the training institution to WIOA staff or an ITA will not be awarded.
 - e. The completion of Section III of the COTF by the financial aid office and the completion of Section IV by the WIOA service provider will ensure that WIOA funds are used in addition to, not instead of, funds otherwise available and are coordinated with those funds.
 - f. Although student loans are one of the forms of financial aid that may be available to participants, WIOA customers are not required or encouraged to incur personal debt as a condition of participation in an ITA. Should the customer choose to incur personal debt, acknowledgement that they have been counseled by their WIOA counselor/case

manager regarding the responsibilities associated with this indebtedness will be recorded in the customer's file.

- g. A participant may enroll in an eligible training program with WIOA funds while an application for Pell Grant funds is pending. However, the case manager must make prior arrangements with the training provider and the participant regarding the allocation of the Pell Grant, if it is subsequently awarded. If the Pell Grant is awarded, the fiscal agent must be reimbursed for WIOA funds previously used to underwrite training for the amount the Pell Grant covers. This is to ensure non-duplication of payments. Pell Grants are intended to provide both tuition and other education related costs; only the portion specifically provided for tuition is subject to reimbursement.
 - h. A new COTF is required annually at a minimum and all semesters included in the billing cycle must be covered on the COTF.
 - i. Customers will apply for and establish eligibility for Higher Education Act Title IV funds and other forms of financial aid before an ITA is awarded. As a last resort, customers will be made aware of the online applications process at www.FAFSA.ed.gov or they may be provided a paper application form if they prefer. Any needed assistance in completing and submitting the forms will be provided by the WIOA counselor/case manager.
5. Training Vouchers - Payments of ITAs are made to the training institution incrementally through payment of a portion of the costs at different points in the training course. The WIOA service provider will be responsible for ensuring that the following processes are adhered to:
- a. Access to training services is facilitated by use of the Individual Training Referral/Voucher Request form. This form provides information about expenditures for tuition, books, fees, and other training-related expenses paid to the training institution and are the mechanism by which the counselor/case manager requests an ITA on behalf of the customer. The ITA is subsequently awarded by WOWDB and the Fiscal Agent will release a Voucher to obligate the WIOA funds.
 - b. Funds will be disbursed for tuition, books, fees and other training-related expenses upon receipt of properly completed invoice from the training institution.
 - c. WIOA Title I ITA expenditures are documented and tracked by the Fiscal Agent to ensure that obligations do not exceed approved WOWDB budget line items.
 - d. WIOA Title I expenditures for training, training-related, and supportive service costs are tracked by the WIOA service provider to ensure that the unmet financial need on the COTF form is not exceeded in any given period of training.
 - e. Payments for tuition, books, fees and other training-related costs will only be disbursed to the training institution one semester or term at a time, or for a six-month period for those institutions that do not operate on a semester or term basis. This does not apply to trainings with one billing cycle.

f. The documentation required to support the payment mechanism of ITA's will include the Individual Training Referral/Voucher Request form, the ITA form, the voucher, the invoice and supporting documentation.

6. ITA Limits

- a. WOWDB ITA limits: Funding-\$6,000.00 for Training Programs that are 8 weeks or less in length or \$10,000.00 for Training Programs more than 8 weeks in length (Other sources of funding that may be awarded to a WIOA customer such as PELL Grants, scholarships, or other one-stop employment and training funding assistance may limit the maximum amount of an ITA.) Time Length-An ITA will be issued for a maximum of 24 months or for the actual length of the training program, whichever is less.
- b. No more than two ITA's may be issued for a participant within a two year period provided the total cost of all ITA's combined does not exceed \$16,000.00. The determination to extend and/or increase a customer's ITA or number of ITA's will be based on the customer's needs as identified in the IEP.
- c. Only one ITA will be approved at a time. The first ITA must be completed and a credential obtained prior to a second ITA being requested or approved. Both ITAs must be within the same Career Pathway and/or the same industry. All documentation will all be in the participant's electronic case file and all documents uploaded into the electronic case file.

7. Forms - Service Provider is required to use the State COTF form and the WOWDB ITA forms. Changes to local forms should be requested in writing.

ACTION REQUIRED: WIOA Service Providers and Fiscal Agent must understand and comply with this policy.

Policy additions and Clarifications

The WOWDB gives authority to the Board Staff to issue additional instructions, guidance, forms, tools, schedules, etc., to further implement the requirements of this policy and to provide quality guidance and oversight of the programs and services as well as the contracted Service Providers and Workforce Offices. The WOWDB will review this policy as needed to ensure compliance with state guidelines and policy as well as any Federal mandates regarding the program. Any additions that might alter the intent of this policy or any changes required by State or Federal mandate will be added by the Workforce Board Staff with the date they were added and such changes/additions will be ratified at the next Workforce Board meeting.

ALL DOCUMENTS MUST BE UPLOADED IN EACH PARTICIPANT'S ELECTRONIC CASE FILE. ALL DOCUMENTATION MUST BE PROPERLY ENTERED INTO THE PARTICIPANT'S ELECTRONIC FILE.