ADMINISTRATIVE POLICIES/PROCEDURES

Local Plan PY 2024-2027
Attachment-15
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Subject: Individual Training Account

Individual Training Accounts (ITAs) will be utilized to fund classroom and occupational skills training services. Payment will be made to the training provider to cover tuition and related education costs (books, fees, etc.) for the approved program of training.

The Workforce Development Board of North Missouri (WDB) supports informed choice by the customer and allows for guidance by program operators during the "consultation with the case manager" described in CFR 663.440. This guidance may include avoiding certain courses of study (based upon occupational demand, reasonable cost, or labor projections) or particular training providers (based upon reasonable cost, placement history, relevance to occupation). Job Center staff assist customers with career choices; however, the ultimate decision on a training provider rests with the customer.

The WDB utilizes the state of Missouri Eligible Training Provider System to make public approved training programs in the region.

ITAs will be reported by sub-recipients as obligations utilizing the region's participant tracking sheet at the time an obligation is made. Once the date to drop classes has passed, the sub-recipient will then report costs as an accrued expense to the WDB effective as of the last date to drop classes.

ITA Guidelines for Adults, Dislocated Workers, and Out-of-School Youth:

- ITA funds cannot be used for participation in training prior to the participant's program enrollment date. If a participant has already started training, an ITA can be issued to cover costs only after the next natural break in training (i.e. semester).
- $8,000 maximum of WIOA funds per participant, per program year if the field of study leads to employment opportunities identified in the Board's Local Plan as a priority sector (Healthcare, Construction/Trades, Manufacturing, and Transportation/Logistics).
- $6,500 maximum of WIOA funder per participant, per program year if the field of study does not lead to employment opportunities identified in the Board's Local Plan as a priority sector.
- The Board may make available funds from other programs/funding sources outside of WIOA for ITA's. These funds may have different funding limits than

WIOA and should be utilized prior to the use of WIOA funds. If the maximum funding is reached for a non-WIOA program/funding source operated by the Board, staff may request to use WIOA funds in addition to the non-WIOA funds. To request this, staff must provide a written request to the WDB Executive Director seeking approval by outlining the participant's need, explaining the amount necessary for the participant to be successful as well as listing the other funding sources being utilized. A determination will be made in writing approving or denying the request.

- Must be a WIOA Adult, Dislocated Worker, or Out-of-School Youth with a training level enrollment;

- Training program must be approved by the region in the State of Missouri's ETPS site. A copy of the approval must be uploaded in the statewide case management system.

- Training time limitation – maximum two (2) years. The two (2) year time period is designed to enable a participant to acquire an Associate's degree or finish a Bachelor's degree. The Board defines two years of training as: twenty-four (24) months from the first date a participant attends training funded through an ITA;

- Participants will only receive one (1) ITA funded training service at a time.

- Pre- requisites will be approved on a case-by-case basis by the Program Director; pre-requisites are included in the two (2) year time limitation;

- Participants must provide a required course list to staff. The staff member will use this list and class schedule to be sure WIOA is paying for required courses. A class schedule must be provided to the WIOA staff;

- WIOA will not pay for repeated courses;

- Participants must be unable to obtain other grant assistance or require assistance beyond the assistance made available, including Federal Pell Grants; WIOA is funding of last resort.

- To avoid duplicate payment of costs when an individual is eligible for both WIOA training funds and other assistance, staff must coordinate the funds available to pay for training. Coordination must include consideration of all available funding sources (excluding loans) to determine an individual's overall need for WIOA funds.

- Veterans Affairs (VA) benefits for education and training services do not constitute "other grant assistance" under WIOA's eligibility requirements. Therefore, eligibility for VA benefits for education or training services does not preclude a veteran or the veteran's eligible spouse from receiving WIOA funded

services, including training funds. Similarly, WIOA program operators may not require veterans or spouses to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training.

- In extenuating circumstances, a participant may be allowed to retain a portion of their Pell Grant (up to 50% for full time students, 25% for part time students). To request this, staff must provide a written request to the WDB Executive Director seeking approval by outlining the participant's need, with an explanation of what the funds will be retained for. A determination will be made in writing approving or denying the request.

- Participants that already have an in-demand degree are not priority of service;

- Assessment testing must indicate that the participant has the skills and qualifications to successfully participate in the selected program of training. One of the following test scores may be used:

    - National Career Readiness Certificate (NCRC) scores must meet or exceed Missouri Economic Research & Information Center (MERIC) recommended scores for chosen training field. If a participant is unable to achieve the required scores, a waiver request must be made to WDB staff for training approval; or
    - TABE or Wonderlic General Assessment of Instructional Need (GAIN®) scores must meet "High Adult Secondary Education" levels and must be administered within 12 months of training activity start date; or
    - Recent college placement test accepted by the approved training provider.

- Training must be in an occupation that leads to economic self-sufficiency or wages comparable to or higher than the wages from previous employment and directly linked to the employment opportunities in the local area (or an area the participant is willing to relocate to), source documentation required;

- ITA funded amount is contingent on availability of funds and unmet financial need of the participant;

- Participant must submit passing grades from the previous semester before staff processes next semester's ITA payment voucher;

- If a participant is not eligible for PELL, staff are required to document the reason in the statewide case management system.

- Participant and WIOA staff must complete an "*ITA Participant Contract Form*"; and

- The ITA commitment must be documented in the statewide case management system. This should be in case notes as well as the advanced fund tracking

module.

- Any exception to the timeline of training or maximum funding amount must be made in writing and include a justification. This will be reviewed for approval by the WDB Executive Director or their designee.

- If a participant drops out of any training, the sub-recipient must attempt to recover the training funds from the training provider, following the training provider's refund policy. Attempts and results must be documented in case notes.

- Staff must utilize the WDB's ITA form. The completed form must be uploaded in the statewide case management system.

ITA Guidelines for In-School-Youth

Regulations do not allow for ITAs to be utilized for In-School-Youth unless a waiver is granted to the state by the Department of Labor. If the waiver is granted to the state, the WDB may apply to offer ITAs to In-School-Youth. In the event this waiver is granted the above rules apply to ITAs for In-School-Youth.

Exceptions to ITA Funding

The Board reserves the right to fund training through the use of training contracts instead of ITAs when one of the following criteria are met.

1. If the Board determines there is an insufficient number of Eligible Training Providers in the local area to accomplish the training for an in-demand occupation utilizing the ITA process.
    - The utilization of this waiver must be approved and documented in Board Meeting Minutes.
    - The Board will have a public comment period of at least 30 days for interested providers to comment.
    - If the Board receives comments from multiple providers, the Board will follow their procurement policy to determine the appropriate provider.
2. It is determined that the most appropriate training could be provided by an eligible training provider in order to facilitate the training of a cohort of multiple individuals in an in-demand industry sector or occupation, as long as the contract does not limit the individual's consumer choice. In this exception, the training provider must still be on the Eligible Training Provider List.
    - A request must be sent to the Executive Director which outlines the benefits of a cohort training contract vs utilizing the individual training account method. Justification should include minimum participation requirement for a class to be conducted, or cost savings.
    - The cost per participant in cohort training shall not exceed the limits

- established for an ITA.
- This waiver requires the written approval of the Executive Director or their designee.
- The contract for cohort training shall be established between the Board and the training provider.

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