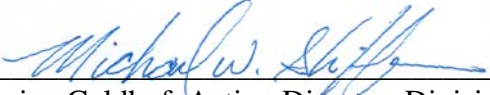


State of Alaska Department of Labor and Workforce Development

Division: Business Partnerships	Policy: 940.00 <i>Final</i>
Subject: Individual Training Accounts (ITAs) Youth	Pages: 5
Reference: Workforce Investment Act (WIA) Title IB Sections 122(e)(5), 133, 134(d)(4); 20 CFR, Subpart D, 663.220, 663.310, 663.320, 663.400 – 663.430, 663.505, 664.500, 663.585; Waiver to the WIA Section 129 and 20 CFR 664.510; 29 CFR 37; 8 AAC 84.100	Effective: July 1, 2005
	Revised:
Approved:  _____ <u>October 21, 2005</u> for Corine Geldhof, Acting Director, Division of Business Partnerships Date	

1) Purpose

This policy provides guidance for the preparation, issuance, and management of Individual Training Accounts (ITAs). Workforce Investment Act (WIA) Youth participants may use the ITA system to purchase training services through qualifying providers under WIA Title IB. The participant shall select an appropriate training program in consultation with the case manager with regard to their Individual Employment Plan (IEP). Using ITAs, participants shall invest in training that leads to self-sufficiency through long-term employment in an occupation in demand.

2) Policy

Staff shall adhere to the following specifications, funding limits, conditions, and documentation required for the issuance or denial of Individual Training Accounts.

3) Definitions

- a) *Individual Training Accounts (ITAs)* are established on behalf of an eligible WIA Title I Youth participant to purchase training services from eligible providers selected in consultation with the case manager. Training services shall be linked to occupations that are in demand in the local area, or another area to which an eligible participant is willing to relocate. Only those courses or programs of course instruction that are specific to an occupation or occupation group or directly lead to employment in the training occupation; e.g. HVAC, Welding Courses, Heavy Equipment Operator training, etc., require ITAs. For those instances of instruction that do not directly relate to a specific occupation or group of occupations use prevocational training services. The board (Alaska Workforce

Investment Board) may approve training for occupations determined to be economic sectors with high potential for sustained demand or growth in its area.

Exceptions to use of ITAs in provision of training services are authorized in the following instances:

- i) Such services are on-the-job training provided by an employer, or Customized Training Plans.
 - ii) The board determines there are an insufficient number of eligible providers of training services in the local area to accomplish the purposes of a system of individual training accounts.
 - iii) The board determines that there is a training services program of demonstrated effectiveness offered in the local area by a community-based organization or another private organization to serve special participant populations that face multiple barriers to employment.
- b) *Individual Service Strategy (ISS)* is the documentation of an ongoing strategy jointly developed by the participant and the case manager that identifies the participant's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals. The ISS is not a contract and does not guarantee services.
 - c) *Supportive services* includes transportation, child and dependent daycare, housing and needs-related payments that are necessary to enable an individual to participate in activities authorized under WIA Title IB.
 - d) *Needs-related payments (NRPs)* provide financial assistance to participants who are enrolled in full-time training and need financial support to remain in training. NRPs provide income support that would otherwise be available through other supportive services and sources such as Unemployment Insurance, Trade Readjustment Allowances and individual resources.

4) ITA Specifications for Youth

Case managers may approve eligible youth for an ITA to purchase qualifying training programs offered by vendors on the Eligible Training Provider List (ETPL). Training services may be available to employed and unemployed adults and dislocated workers who:

- a) Are enrolled as a participant in a Title I Youth program;
- b) Receive at least one intensive service;
- c) Per a comprehensive assessment is unable to obtain or retain employment that provides a self-sufficient wage;
- d) Per a comprehensive assessment will benefit from training;
- e) Receive counsel regarding appropriate training opportunities and resources; and,
- f) Do not have other resources available.

5) Funding Limit

Youth ITA funding is limited to \$5,000 per participant per year. The Director or designee of the Division of Business Partnerships (DBP) may authorize a higher ITA amount on a case-by-case basis to provide participants maximum choice in selecting the appropriate training program.

6) Conditions on ITAs

- a) The case manager must consult with the participant regarding training needs and interests. This consultation should include a review or assessment of the participant's interests, aptitudes, skills, and needs. The case manager shall approve only training for occupations in demand that are likely to result in employment in the local area (or an area where the trainee will relocate), and at a wage rate that is acceptable to the trainee. Case managers shall approve only training that the participant commits to complete, and participants shall certify their commitment in writing. The occupational goal must be consistent with the training selected.
- b) WIA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay for their training, or to those who require assistance beyond that available under grant assistance from other sources. The case manager, in coordination with the participant, training provider, and partner agencies, must consider the availability of non-WIA funds in developing training plans. All participants seeking training must apply for a Pell grant unless the training program selected is not eligible for Pell funding or other financial assistance. Case managers must document Pell Grant ineligibility in the case file.
- c) WIA participants may enroll in WIA-funded training while their application for a Pell Grant is pending with the following conditions: The case manager must make arrangements with the training provider and the WIA participant regarding adjustment to the allocation in the event of an award. If the client receives a Pell grant award, the case manager must reduce the ITA by the amount of training covered by the Pell Grant [WIA sec. 134(d)(4)(B)]. Case managers should consider Pell grant allocations for related expenses in designing WIA support services to avoid duplication.
- d) The participant must agree to provide attendance information, grades and/or progress reports while enrolled in WIA-approved training activities, or agree to allow the training provider to release such information to the case manager. Upon completion of training, the participant must agree to provide or authorize the provision of documentation of completion of training. When hired the participant must agree to provide the department with the name of their employer and their wage/salary information. Participants must indicate a willingness to engage in follow-up activities for a period no less than 12 months from the first day of employment.

- e) Case managers shall provide participants maximum choice in selecting an appropriate training program and training provider, including out-of-state providers. Case managers may not refuse an ITA solely because a training program is outside the local area. All programs must have WIA certification in their state of origin. Out-of-state training programs must demonstrate superior cost-benefits or be exclusive programs not available in Alaska. All out-of-state training is subject to the review and approval by the ESD Director.

7) Required Documentation

Case managers must document ITAs that comply with the process outlined above. At a minimum case managers shall use case notes and the Individual Service Strategy (ISS) to demonstrate the following:

- a) *Consultation with the participant* regarding training needs, including: assessment of participant's interests, aptitudes, and skills; determination of the likelihood of participant obtaining employment (based on skills shortages) in the local area or area of relocation at an acceptable wage rate; determination of the likelihood of participant successfully completing the training; and the participant's written certification to attend classes and complete the training program.
- b) *Coordination* with the participant, training provider, and partner agencies on non-WIA funds in developing the training plan. Where applicable, the case manager must document the award or denial of Pell grants or other financial aid. Case managers shall specify with whom coordination occurred and when it took place.
- c) *Provision of information* regarding student attendance, grade or progress reports by the participant or by the training provider; evidence of training completion through certificate, degree, licensure, or other documents; employer and wage information; and follow-up activities.
- d) *Rationale for funding*, including:
 - i) The amount of the ITA;
 - ii) If applicable, the approved waiver by the Business Partnerships Director or designee for selection of a training program that exceeds the funding limits for training services;
 - iii) If applicable, evidence of the availability of other funds to cover costs.
- e) *Denial of an ITA*, if applicable.

8) Denial of ITAs

Denial of an ITA may occur under the following scenarios:

- a) The ITA annual cost exceeds the participant annual limit per funding stream for the entire training program unless the Director of Business Partnerships approves those amounts. Case managers must document supporting this level of assistance in the case file.
- b) The participant is unlikely to succeed in training based on an objective or comprehensive assessment of their needs or abilities.

- c) The training is unlikely to result in stable employment at an income level sufficient to meet the participant's needs.
- d) The participant or training provider refuses to comply with reasonable requirements and conditions regarding enrollment, payments, and information sharing.
- e) Staff shall not issue ITAs retroactively. The department shall not fund training that the participant has completed or begun prior to eligibility and issuance of an ITA. Thereafter, the case manager may fund training in progress if appropriate.
- f) Case managers shall not provide WIA Title I funds that support employment generating activities, economic development activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers, and similar activities that are not directly related to training for eligible individuals. No funds shall be used for foreign travel.

The department reserves the right to establish minimum performance standards for training providers and individual training programs. The department also reserves the right to waive dollar limitations for ITAs on a case-by-case basis upon review by the Director of Business Partnerships