



POLICY #: P-11
Individual Training Accounts

ISSUED: May 17, 2018

REVISED: July 21, 2022

PURPOSE

To provide program guidance which ensures compliance for Individual Training Accounts (ITAs) for WIOA-eligible Adults and Dislocated Workers and Out of School Youth aged 18-24.

REFERENCES

- WIOA Sections 3(36), 122(g), 134(c)(3)(D) - (G)
- 20 CFR Parts 680.210, 680.300-340, 680.420, 681.550
- TEGL 19-16
- State of Oregon Eligible Training Provider Policy

DEFINITIONS

Approved programs: Programs for which an ITA may be issued and are complete programs of occupational training offered by Eligible Training Providers.

Eligible Training Providers: State approved, licensed, or authorized education or training institutions which have applied to and been named on Oregon, Washington, Idaho and Utah's Eligible Training Provider List (ETPL).

Individual Employment Plan (IEP): Developed with a participant, an ongoing strategy to identify employment goals, achievement objectives, and appropriate combination of services for the participant to achieve their employment goal.

Individual Training Accounts (ITAs): The primary mechanism through which eligible Adult and Dislocated Worker and eligible Out of School Youth participants may purchase occupational training services from the Eligible Training Providers of their choice for an occupation on the Strategic Occupations list.

Program of Training Services: One or more courses or classes, or a structured regimen that leads to a recognized post-secondary credential, secondary school diploma or its equivalent, employment, or measurable skill gains towards such a credential or employment.

Strategic Occupations List: Clackamas Workforce Partnership's list of occupations considered "in-demand" or with significant annual openings or vacancies. Occupations on the list are the priority for occupational training Individual Training Account (ITA) funding. Occupational training programs and training providers funded with ITAs must be on the Statewide Eligible Training Provider List. Exceptions to the ETPL or to the Strategic Occupation List must be brought to the Clackamas Workforce Partnership's Adult and Dislocated Worker Program Manager for review and consideration prior to funding.

Under-employed: Individuals employed less than full-time who are seeking full-time employment, who are employed in a position that is inadequate with respect to their skills and training, who are employed but meet the definition of a low-income individual, or who are employed but show current

job's earnings are not sufficient compared to their previous job's earnings from their previous employment.

POLICY

To be eligible to receive an ITA, WIOA Title IB Adults and Dislocated Workers and Out of School Youth must meet the following conditions:

1. After an interview, evaluation, or assessment have been determined to be in need of training services and to have the skills and qualifications to successfully complete the selected training program documented in the IEP;
2. Be 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 without training services;
3. If employed, meet the definition of under-employed;
4. Select an approved program of training services or eligible courses that are directly linked to employment opportunities for occupations that are on the Strategic Occupations List; and
5. Are unable to obtain grant assistance from other sources to pay the costs of such training or require WIOA assistance in addition to other sources of grant assistance.

Selection of Courses, Programs, and Training Providers

ITAs may be issued only for approved programs on the Eligible Training Provider List.

Training services that are not required to be on the ETPL are:

1. On-the-job training; customized training; incumbent worker training; internships; paid or unpaid work experience; transitional employment;
2. The circumstances described at WIOA 134(c)(3)(G)(ii), where the Local Board determines and documents that:
 - a. There are insufficient providers, or
 - b. There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment, or
 - c. It would be most appropriate to award a contract to an institution of higher education or other provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such contract does not limit customer choice, or
 - d. Short-term pre-vocational training defined as soft skills that prepare individuals for employment or training, or
 - e. Workforce preparation training, or
 - f. Subscription or membership fee based self-paced training, or
 - g. Training that consists solely of material purchased for a fee and is self-paced.

Length of Training

There is no set time limit for the length of training. The appropriateness of a participant's participation in any occupational skills training should be based on the participant's individual needs and situation. It is recommended that sub recipient procedures include an agreement

between the participant and sub recipient on the length of the training and the time the participant must complete the training.

Training Costs

ITAs may be used to pay for the costs of a participant's training, including required registration, tuition, fees, books, equipment, disposable supplies, and other required payments. To the extent possible, sub recipient procedures should provide direct payment to the training provider for training costs rather than reimbursement to the participant.

Although there is no absolute dollar limit on the training cost, an average cost per client of less than \$3,500 is desirable.

Sub recipient must coordinate funding for ITAs with any available funding from other Federal, State, local, or private job training programs or sources to assist individuals in obtaining training services.

Satisfactory Progress

To be able to receive all of their planned ITA payments and any related support payments, participants must maintain satisfactory progress in their training. Satisfactory progress is defined as a level of success in a training program that is generally recognized as acceptable and demonstrating advancement within the program, such as a "C" or 2.0 grade point average in a traditional academic setting. Satisfactory progress includes meeting all attendance and behavior requirements mandated by the training provider.

Administration

Sub recipients providing ITAs are responsible for ensuring that they have processes and procedures for:

1. Determining and documenting each participant's need and eligibility for training and assessing the participant's skills and qualifications to successfully complete the selected training program in the participant's individual employment plan;
2. Assisting the participant in making informed decisions in the selection of approved programs, eligible courses, and eligible training providers;
3. Determining the participant's needs for WIOA funds, balancing outside resources and other financial aid, including Pell Grants;
4. Documenting training plans, including programs/courses, providers, costs, time-lines, and special circumstances, if any;
5. Tracking and documenting each participant's progress (including a mid-term check in), ensuring participants maintain satisfactory progress;
6. Making and documenting direct payments to training providers for ITA-related costs;
7. As appropriate, pre-approving, making, and documenting reimbursements to participants for training-related costs; and,
8. Documenting training-related outcomes for each participant.

Approved:

Peter Lund

Peter Lund (Jul 21, 2022 10:49 PDT)

07/21/2022

Peter Lund, Clackamas Workforce Partnership Board Chair

Date