

Individual Training Account (ITA) Policy

WIA Adult, Dislocated Worker and TAA

Each Local Workforce Investment Board (WIB) is required, under the Workforce Investment Act (WIA), to set ITA policies for Adults and Dislocated Workers using training services that define time limits and dollar limits (caps).

ITAs are subject to the following conditions:

- There is reasonable expectation of employment following the completion of such training and the training is in a demand occupation.
- The worker is qualified to undertake and complete such training. The worker's personal qualifications to undertake and complete the training must be assessed. Evaluation of the worker's qualifications must include the worker's physical and mental capabilities, educational background, work experience and financial resources, as adequate to undertake and complete the training program.
- **If applicable**, evaluation of the worker's financial ability will include their remaining weeks of UI and TRA in relation to the duration of the program. If the worker's UI and TRA payments will exhaust or are not adequate, staff shall ascertain that personal or family resources are available to support the worker for the duration of the training program.
- Training which involves fewer than 120 instructional hours is not deemed to be of sufficient duration to assure significant skill development. Therefore, courses shorter than that shall not be approved without sufficient justification.
- It is not permissible to approve and pay tuition costs for the first two years of a four-year program because the adversely affected worker would not be ready for employment at the end of the training period.
- A training program can include a reasonable contribution from the trainee, including loans. The reasonableness of the burden, current and future, must be considered.

Financial Aid

WIA and supporting regulations are quite clear in the requirement that financial aid be sought to offset some or all of the costs of training. While it is stated that an individual must apply for all types of financial aid including the Pell grant prior to an ITA being authorized, a great deal of confusion exists as to what that means. The intent of the Pell grant regulations and the WIA regulations is to avoid duplicate payments for the same service.

It is the local requirement that an individual only has to apply for financial aid to get the ITA, not to be in receipt of it.

Initially, the individuals will be sponsored into training using a WIA ITA that would then be offset by any financial aid awards that are received by the institution. The institution must agree to:

- **Notify the One-Stop upon receipt of financial aid awards, including the amount of the funding received**
- **A procedure depicting the amount (if any) of excess Pell grant funds that the individual is entitled to after all tuition and tuition-related charges are paid**
- **Reimburse the Grant Recipient for ITA funds received once the financial aid is received and processed (the policy should include timelines for reimbursement).**

The policy also applies to the application for funds that are not federal in origin, such as state or local financial aid, student loans and scholarship awards.

Demand Occupations

The WIB recognizes that the demand occupations in the region do not represent the universe of employment opportunities.

The North Country's demand occupations include those on New York State Department of Labor's Demand Occupation List, as modified by the Local WIA's Labor Market Information.

ITA Cap:

- ITA's will be capped/limited to \$6,000 a one year. Under special circumstances, on a case-by-case basis and with proper justification, a counselor could request a waiver to exceed the \$6,000 limit the Local WIB Executive Director.
- **For purposes of ARRA funding, the Local WIB Executive Director will have the authority to increase this ITA amount, as necessary.**

ITA Timeframe:

- ITA funded training will be allowed for a maximum of two years. Under special circumstances, on a case-by-case basis and with proper justification, a counselor could request a waiver to extend training beyond the two year limit.
- IEPs are required for an ITA to be issued. Justification for training must be clearly documented in customer's IEP.
- All IEPs are developed in conformance with Assessment requirements as prescribed in Technical Advisory #08-4.
- Distance learning is approvable, but it must be a structured program with an on-line instructor available to assist students; include periodic testing and performance measures throughout the program. On-line providers must be on the Eligible Training Provider List.

ITA Review and Approval Process

1. One-Stop staff and customer explore all other funding possibilities
2. One-Stop staff verifies with supervisor that WIA funding is available for intended ITA; this verification is in accordance with local WIB procedures.
3. One-Stop staff verifies that customer meets Training Provider pre-requisites for acceptance
4. One-Stop staff verifies that Training Provider is on Eligible Training Provider list
5. One-Stop staff sends final ITA to Training Provider
6. Training Provider counter-signs ITA and returns original
7. One-Stop staff gives original to Fiscal and copy to customer
8. Training Provider sends respective One-Stop completed invoice covering period of training received to date

The staff person conducting the comprehensive assessment and developing an IEP is authorized to develop and submit an ITA to the OWS Manager for funding approval.

Customers enrolled in a credit program must maintain a minimum 2.0 cumulative grade point average. Those in non-credited training must have documented satisfactory progress. If the customer falls below the minimum, he or she may be subject to loss of benefits.

Any change in the type of courses or number of credits must have prior approval of OWS staff. A Voucher Change Authorization must be completed and sent to the training institution, a copy should be kept with the original ITA. Each recipient of an ITA must sign the Customer Rights and Responsibilities Agreement. This agreement should be with the ITA and is attached to this policy.

Priority of Sectors

The North Country WIB agrees that those sectors identified by the Governor: advanced manufacturing, healthcare and green technology will be priority sectors.

Veterans' Priority of Services

All Veterans and eligible spouses will receive priority of service.

Priority of Services

The North Country WIB has determined that no priority of service policy is needed in the region, at this time.

Regional Self-Sufficiency Standard for Adults

Self-sufficiency, as it is used in this ITA Policy for adults, shall mean: having an individual income that is less than 225% of the Poverty Level for a family of one.

Income will be determined using the following calculation:

225% of Poverty Level for a family of one (\$24,368)/52 weeks/30 hours per week

Current training programs that address skills needed for demand occupations:

- North Country region has limited classroom training programs; there are healthcare training options available at the community colleges and BOCES. Both BOCES offer vocational programs for adults.
- On-the-Job Training and customized training will also utilized to meet the skill needs of demand occupations

ITA funds available:

- 30% of PY 09 Adult and Dislocated Worker funds will be dedicated to training. No less than 50% of Adult and Dislocated Workers AARA (Stimulus funds) will be allocated for training.
- These amounts may be revised during the course of the program year