



POCONO COUNTIES WORKFORCE DEVELOPMENT BOARD (WDB)/AREA (NE 135)

INDIVIDUAL TRAINING ACCOUNT (ITA) POLICY

1. PURPOSE

The Pocono Counties Workforce Development Area has developed the following Individual Training Account (ITA) Policy to insure compliance with the Workforce Innovation & Opportunity Act, Sections 680.230 through 680.340. The purpose is also to support the use of WIOA resources to increase the High Demand Occupational skills of the PCWDA workforce in line with the goals described in the Pennsylvania State Plan.

The Pocono Counties WDA, in order to coordinate and leverage the various resources that support our service delivery strategy and strategic plan, recognizes that WIOA funds are uniquely designed to provide training services to meet the skilled workforce needs of our employers, as well as the career goals of our area's job seekers. In support of this goal, and to avoid duplicating the services supported through other Federal and State resources, the PCWDA Title I Service Providers will prioritize the use of WIOA funds to support ITA and other training services to meet the needs of our customers, as well as the performance goals as described in the Act.

2. EFFECTIVE DATE

7/1/18

3. IMPLEMENTATION

A. PCWDA ITA Limitations

In compliance with WIOA Section 680.310, the Pocono Counties Workforce Development Board has established the following limits for use of Adult, Dislocated Worker, Rapid Response, or Out-of-Youth funds for ITA services.

- The maximum training cap per customer is \$8,000.00
Based upon local budgetary considerations, a Title I Service Provider can, in consultation with the PCWDA Administrative staff, reduce the maximum training cap below \$8,000.00

- The maximum time limit for completion of an eligible training plan is 2 years.
- Participants receiving ITA services will not be eligible for additional ITA services for a period of 5 years from the date they ended their ITA training.
- The PCWDA has implemented the Waiver of the statutory exclusion and regulatory prohibition of using ITAs for Out-of-School Youth.
- The PCWDA does not allow the use of ITAs for In-School Youth.
- The PCWDA allows individuals to select training that costs more than the training cap when other sources of funds are available to supplement the funds available through the ITA.

In compliance with WIOA Section 680.320, the following mechanisms other than ITAs may be used to provide training services.

- When the training services provided are On-the-Job Training (OJT), customized training, incumbent worker training, or transitional jobs.
- When the Pocono Counties WDB determines that there are training services offered in the area, through a publicly advertised Request for Proposal (RFP) process, by a community based or other private organization to serve targeted Adult, Dislocated Worker, or Youth individuals with barriers to employment.
- There are no other exceptions to the use of ITAs for training services at this time.

B. Eligible ITA Training Providers

1. In conforming to WIOA requirements regarding customer choice in selecting a training provider, any training program listed on the Pennsylvania Eligible Training Provider List is eligible for approval by the Title I Service Provider reviewing the request. **The Title I Service Provider must, however, verify that there is a current Non-Financial Agreement in place with the training provider before approving the customer's training request.** This limitation is to ensure the training provider will comply with applicable WIOA Provisions required for payment by the Pocono Counties Fiscal Office.
2. Title I Service Providers should prioritize training for occupations determined in High Demand for the Pocono Counties WDA. However, since a high percentage of Pocono Counties WDA job seekers pursue employment opportunities in adjacent labor markets, training for any occupation eligible for the ETPL may be approved.
3. In order to ensure informed choice, job seekers investigating training services should be made aware of relevant information on program costs, training length and schedule, and performance information for all eligible training providers in the area, especially if there are multiple providers offering similar training.

C. WIOA Participant ITA Eligibility Requirements

In compliance with WIOA Section 680.210 and 680.220 the PCWDA allows ITA training services for the following eligible Adult, Dislocated Worker, Rapid Response, and Out-of-School Youth.

1. Individuals who have received either an interview, evaluation, or assessment, and career planning services necessary to make an eligibility determination and meet the criteria listed below.
 - a. Are determined to 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 through career services.
 - b. Have the skills and qualifications to be accepted and participate successfully in the training program selected.
 - c. Who are unable to obtain grant assistance from other sources to pay the costs of such training.
 - d. Individuals applying for training through the Adult funding stream must be determined eligible in accordance with the Pocono Counties WDA Adult Priority of Service Policy.

D. ITA Application/Approval Process

1. The Title I Service Provider providing WIOA services in any Pocono Counties WDA CareerLink® or affiliate site should prioritize the provision of ITA services to residents of their respective counties. They may, however, provide ITA services to any resident within the Pocono Counties WDA if there is sufficient funding available, and the Title I Service Provider makes a determination that the provision of employment or training services is more convenient to the job seeker through their service location.
2. The Title I Service Provider may determine the assessment, application, and approval process required by the eligible job seeker for ITA services. This process must be consistent for all job seekers applying to the Title I Service Provider in their county and in compliance with the WIOA and PCWDA ITA policy requirements.
3. The application process utilized by the Title I Service Provider for customers applying for ITA services may include any or all of the following:
 - a. Interview
 - b. Review of the applicant's prior work history and education as provided in the customer's CWDS registration.
 - c. Basic Math and/or Reading Skills Assessment (CASAS)
 - d. Interest/Aptitude Assessment
 - e. Written Training Request Proposal
 - f. Relevant information regarding the customer's financial resources and other support needed to participate and complete the training/employment goal.

4. The ITA review process utilized by the Title I Service Provider must use the Pocono Counties WDA ITA Cost Estimate Form to document the estimated school and student costs needed to enroll and participate in the requested training program. This form is also required to document that the applicant has satisfied the requirements in WIOA Section 680.210 to apply for any other Federal or State grants, if available, that may assist with the costs of their training.



ITA Cost Estimate
Form (PRINT VERSIO

5. The WIOA Participant File must contain a determination, either in the form of an IEP/ISS, case notes, or other documentation of the need for training services by the Case Manager or staff approving the ITA.
6. Once approved, the Title I Service Provider will complete a Pocono Counties Purchase Requisition Form, based on the information provided in the ITA Cost Estimate Form submitted as part of the customer's training application. The Purchase Requisition form will be signed by the Title I Service Provider Director and sent to the Training Provider to confirm that the WIOA customer's training request has been approved, and the amount of ITA funding that the Pocono Counties WDA will contribute to the customer's training costs. A copy of the approved Purchase Requisition form will be sent to the Pocono Counties WDA Fiscal Office. *** No payment for approved ITA costs will be made unless the Pocono Counties WDA Fiscal Office has both a copy of the WIOA Application documenting the approved customer's eligibility determination and a current Non-Financial Agreement in place with the Eligible Training Provider listed on the Purchase Requisition form.**



ITA Purchase
Requisition (4-2020)

7. Title I Service Providers are required to track both obligations and expenditures for approved ITA services that they are responsible for in order to monitor these costs relative to their respective County WIOA Adult, Dislocated Worker, Rapid Response, and Out-of-School Program allocations. Invoices for approved ITA training services must be directed to the Pocono Counties Fiscal Officer in accordance with the school's normal billing and refund policy for payment.

D. ITA CWDS/Case Management Requirements

In addition to the requirement to record ITA and related services and outcomes in CWDS per the PCWDA System of Record Policy, Case Management staff responsible for the WIOA participant should maintain contact with both the training provider and participant for the following purposes.

1. Tracking/Documentation of participant attendance and progress in achieving training and performance related benchmarks.
2. To assist in resolving any problems with participant attendance and monitor customer satisfaction with the quality of the training provider/program.
3. To assist the participant in addressing issues or problems that may adversely affect the participant's ability to complete their training goals.
4. To document the achievement of performance related training benchmarks.

Documentation in the participant file related to these responsibilities may be in the form of attendance or progress reports, IEP/ISS documentation, school records or progress reports, case notes, or documents related to certifications/licenses, or similar documentation.

E. Miscellaneous ITA Procedures/Responsibilities

1. If there are changes to the cost, training outline, or projected ending date for an approved ITA training plan, the Pocono Counties ITA Modification Form must be completed and signed by the Training Provider and the Title I Service Provider responsible for the customer. The modification form will indicate what changes were made along with the reason for the modification. A copy of the completed modification form must be sent to the Pocono Counties Fiscal Office.



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2. In addition to recording ITA services and changes in CWDS and on the customer's IEP/ISS, it is imperative that certain information, documentation, and CWDS service reporting requirements related to WIOA Performance Measures are completed in a timely manner.
 - a. In addition to recording the WTS01 service for Adults/Dislocated Workers, or WYS06 for Out-of-School Youth, staff must record the following outcomes to those services at the time they are enrolled.
 - Adult or Dislocated Worker** – Entered Secondary/Post-Secondary/Advanced Training
 - Out-of-School Youth** - Enrolled in Education
 These outcomes must be recorded in order for the customer to be included in the Performance Measures for Attainment of a Degree/Certificate and Measurable Skill Gains
 - b. Information on ITA customer training outcomes such as diplomas, degrees, certificates, and licenses received either during or following participation in ITA services must also be documented in order to ensure ITA customers' success in achieving the Attainment of a Degree/Certificate and/or Measurable Skill Gains are captured accurately.