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North Country Workforce Development Board Individual Training Account (ITA) Policy WIOA Adult, Dislocated Worker and TAA

Under the Workforce Innovation and Opportunity Act (WIOA), Workforce Development Boards (WDB) are required to set Individual Training Accounts (ITA) policies for Adults and Dislocated Workers using training services that define time and dollar limits and dollar (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 to undertake and complete the training
 program.
- If applicable, evaluation of the worker's financial ability to 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 of sufficient duration to assure significant skill development. Courses shorter than that shall not be approved without justification unless the training leads to a job-skills training certificate.
- It is not permissible to approve and pay tuition costs for the first two years of a four-year program because the 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

WIOA and supporting regulations require that financial aid be sought to offset some or all of the costs of training. An individual must apply for financial aid, including Pell grant, prior to an ITA being authorized as Pell grant and WIOA regulations are designed to avoid duplicate payments of services.

Individuals have to apply for financial aid to get the ITA, not to receive it.

Initially, the individual will be sponsored into training using a WIOA ITA that would be offset by financial aid awards received by the institution. The institution must agree to:

- Notify the OneWorkSource Center 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 service provider in a timely manner for ITA funds received once the financial aid is received and processed.

This policy also applies to funding applications that are not federal such as state or local financial aid, student loans and scholarships.

Demand Occupations

The NCWDB recognizes that demand occupations in the region are part of the employment opportunities.

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

ITA Cap:

- ITAs will be limited to a maximum of \$6,000 per year. On a case-by-case basis and with justification, a counselor can request a waiver to exceed the \$6,000 limit to the NCWDB Executive Director.
- Individual counties can choose to have a lower amount than the \$6,000 allowed to enable to service more clients.

ITA Timeframe:

- ITA-funded training is allowed for a maximum of two years. On a case-by-case basis and with proper justification, a counselor can request a waiver to extend training beyond the two year limit to the NCWDB Executive Director.
- 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 #08-4.2.
- Distance learning is allowed but must be as part of a structured program with an on-line instructor available to assist students and 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. OneWorkSource Center staff and customers need to explore all funding possibilities.
- OneWorkSource Center staff needs to verify with their supervisor that WIOA funding is available for the intended ITA and this verification is in accordance with NCWDB procedures.
- 3. OneWorkSource Center staff needs to verify that customer meets the training provider's prerequisites for acceptance.
- 4. OneWorkSource Center staff needs to verify the training provider is on Eligible Training Provider List (ETPL).
- 5. OneWorkSource Center staff will send the completed ITA form to the training provider.
- 6. The training provider will counter-sign the ITA form and return the original to the OneWorkSource Center.

Staff conducting the comprehensive assessment and developing the IEP is authorized to develop and submit an ITA to the OneWorkSource 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 standards, 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 (VCA) 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 /TA and is attached to this policy.

Priority Sectors

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

Priority of Services

The NCWDB determines that Veterans are the priority services in the region, at this time.

Regional Self-Sufficiency Standard for Adults

Self-sufficiency, as used in this ITA Policy for Adults, shall mean having an individual income as established by NYS DOL Self-Sufficiency Employment Estimator Calculator (https://applications.labor.ny.gov/SEE_Project/seeLandingPage.faces) as per the client's county of residence.

Income will be determined using the following calculation:

• By using <u>NYS DOL Self-Sufficiency Employment Estimator Calculator</u> for a family of one per the client's county of residence.

Current training programs that address skills needed for demand occupations:

- The North Country region has limited classroom training programs; there are healthcare training options available at the community colleges, CV-TEC and FEH-BOCES. Both BOCES offer vocational programs for adults.
- On-the-job training and customized training will meet the skill needs of demand occupations.

ITA funds available:

- 35% of Adult and Dislocated Worker funds will be dedicated to training and required items under the training program(s) including, but to limited to:
 - Tuition
 - Books
 - Other required items for the training