



GUIDING MARION COUNTY'S WORKFORCE

POLICY OF EMPLOYINDY

Policy Name	WIOA Individual Training Accounts
Policy Number	2018-002
Program Funding Stream	WIOA – Adult, Dislocated Worker and Out of School Youth

REV	Description of Change	Author	Effective Date	Review Date
	Replaces 2015-019 (Training Service Requirements) and 2015-034 (Individual Training Accounts (ITA))	J. Schlake	5/15/2018	4/15/2019
1	Removes drug screening requirement; updates economically disadvantaged criteria	K.Duffy	8/2/2018	8/2/2019

1. Purpose

The purpose of this policy is to establish guidelines for Workforce Innovation and Opportunity Act (WIOA) funded training with Individual Training Accounts (ITAs).

2. Scope

This policy provides guidance to EmployIndy, WIOA-funded Service Providers, and training vendors concerning eligible use, maximum duration, maximum funding, coordination of funding, reimbursement payment structure, allowable costs, and exceptions for WIOA funded training ITAs for adult, dislocated worker, and out of school youth.

3. Summary of the Law, Rules, and Governing Policies

[29 U.S.C. § 3174\(c\)\(3\)](#) outlines federal requirements for training activities for adults and dislocated workers and ITAs

20 C.F.R. Parts [680](#)¹ and [681](#)² outlines federal regulations for training and ITAs

¹ <https://www.law.cornell.edu/cfr/text/20/part-680>.

² <https://www.law.cornell.edu/cfr/text/20/part-681>.

The Indiana Department of Workforce Development issued [DWD Policy 2017-09](#), “Guidance Related to WIOA Individual Training Account Funding, dated December 7, 2017, outlines state requirements for local ITA policy.”³

The [Indiana Department of Workforce Development’s Policy 2017-01](#), dated July 17, 2017, outlines the information, criteria, and procedures for the Eligible Training Provider List.⁴

4. Responsibilities

WIOA-funded Service Providers are responsible for following all requirements of this policy.

EmployIndy Career Services Department is responsible for providing guidance and periodic review of this policy.

EmployIndy Quality and Analytics Department is responsible for monitoring WIOA-funded Services Providers for compliance with this policy as well maintaining accurate account balances in Indiana Career Connect (e.g. responding to requests from WIOA-funded Service Providers to reconcile balances if/when vouchers are but funds are not utilized).

EmployIndy Finance and Administration Department is responsible for payment of ITA vouchers submitted to EmployIndy by training vendors. EmployIndy Finance and Administration Department is responsible for updating ICC for vouchers that have been paid.

5. Policy Statement

WIOA funded ITAs may be established on behalf of WIOA participants to purchase training services from a provider on the Eligible Training Provider List (ETPL). Training providers must be selected in consultation with WIOA-funded Service provider staff and approved for use in Marion County/Region 12 as noted on the Indiana Eligible Training List.⁵

Eligible Use

WIOA funded ITAs for Training services may be available to adults, dislocated workers, and out-of-school youth. To be eligible, participants must:

1. Meet WIOA eligibility requirements as outlined in the [EmployIndy WIOA Participant Eligibility Policy](#),⁶
2. Meet all criteria outlined in the [EmployIndy Client Assessments Policy](#)⁷ specific to training services;
3. After an interview, evaluation, or assessment and career planning, have:
 - a. Been determined to be unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency (see the “Self-Sufficiency Chart” at the end of this document) or wages comparable to or higher than wages from previous employment, through career services alone;

³ https://www.in.gov/dwd/files/ITA%20Policy_final.pdf.

⁴ https://www.in.gov/dwd/files/ETPL%20Policy%20_Final.pdf.

⁵ <https://webapps.dwd.in.gov/INTraining/>.

⁶ <https://employindy.org/wp-content/uploads/2017/08/1-1-1-WIOA-Participant-Eligibility.pdf>.

⁷ <https://employindy.org/wp-content/uploads/2017/08/1-2-2-Client-Assessments.pdf>.

- b. Been determined to be in need of training services in order to obtain or retain employment that leads to economic self-sufficiency (see the “Self-Sufficiency Chart” at the end of this document) or wages comparable to or higher than wages from previous employment;
 - c. Been determined to have the skills and qualifications to successfully participate in the selected training program; and
 - d. Selected training services that are directly linked to the employment opportunities in the local area;⁸
4. Be unable to obtain grant assistance or require assistance beyond that made available under other grant assistance programs;⁹ and
 5. Satisfy the [EmployIndy Background Check Policy](#)¹⁰ prior to enrollment into the selected occupational training services program.

Maximum Duration

For approved participants pursuing a training program other than Associate’s or Bachelor’s degree, the total ITA award shall not exceed twelve (12) months.

For approved participants pursuing a training program of Associate’s or Bachelor’s degree, each ITA shall be for no more than twelve (12) months and the total ITA award shall not exceed two (2) ITAs within a twenty-four (24) month period. Each ITA voucher should be written per semester or term.

All approved participants must be enrolled in an approved training program within thirty (30) days of designation of the ITA award.

The ITA is not guaranteed for the entire period for which it is written.

Beyond the initial voucher and payment to the training provider, in order to receive additional vouchers for payment of subsequent semesters or terms, training participants must prove that they have sustained a minimum GPA of 2.0 or “Pass” if the course is Pass/Fail. Participants who do not maintain a GPA of 2.0 or have failed a program are not to be issued subsequent vouchers.

⁸ 29 USC 3174(c)(3)(A)(i).

⁹ 29 USC 3174(c)(3)(B)(i).

¹⁰ <https://employindy.org/wp-content/uploads/2017/08/1-3-3-Background-Check.pdf>.

Maximum Funding

Following are the funding limitations based on training/credential type:

Training/Credential Type	Maximum Amount of Funding	Prerequisites	
High School Equivalency	\$700 per participant (exception only)	Exception Approval*	
* Title II, Adult Basic Education partners shall be used for all high school equivalency preparation services. A WIOA funded ITA may be used to pay for the costs of the secondary equivalency exam only when other sources are not available and if approved by EmployIndy Director of Career Services.			
Prevocational Training	\$2,000 per participant**	High School Diploma or Equivalency	
**Multiple prevocational training programs may be funded per program participant; however, funding shall not exceed the total prevocational funding limit.			
Occupational Training***	Postsecondary Certificate (non-degreed credential)	\$4,500 per participant	High School Diploma or Equivalency
	Associate's Degree	\$3,000 per 12 month period with a maximum of \$6,000 to be utilized within a 24 month period	High School Diploma or Equivalency Diploma
	Bachelor's Degree	\$3,000 per 12 month period with a maximum of \$6,000 to be utilized within a 24 month period	Must have 2 years of postsecondary education or have obtained an Associate's Degree prior to program enrollment.
	On-the-Job Training (OJT)	Limitations as stated in the EmployIndy On-the-Job Training Policy ¹¹	None
	Customized Training	Limitations as stated in the EmployIndy Customized Training Policy ¹²	None
	Incumbent Worker Training (IWT)	None – EmployIndy does not offer Incumbent Work Training (IWT) at this time.	None
	Transitional Employment	None – EmployIndy does not offer Transitional Employment at this time.	N/A
*** Only one occupational training program may be funded per period of participation.			

Coordination of Funding

A comprehensive assessment of the cost of the ITA, which involves accessing other grants or funding, including Federal Pell Grants, Trade Adjustment Assistance (TAA), and scholarships, must be conducted to ensure best utilization of WIOA funds.

¹¹ <https://employindy.org/wp-content/uploads/2017/08/4-3-On-The-Job-Training.pdf>.

¹² <https://employindy.org/wp-content/uploads/2017/08/4-1-Customized-Training.pdf>.

Once it is determined that a participant is eligible for training services, WIOA-funded Provider staff must take into account the full cost of training based on the participants needs (tuition, books, daycare, housing, transportation, etc.) and also consider the full availability of financial assistance for the participant.

WIOA-funded Provider staff are required to coordinate all funding sources available to meet the participants needs. The coordination of funding requirement will be met by completing the *Financial Award Analysis* (form attached) for each participant. The *Financial Award Analysis* shall be uploaded into Indiana Career Connect. All funding sources that are expected to be used to fund the training pursuant to the *Financial Award Analysis* should also be clearly indicated on the ITA voucher.

Participants are not required to apply for or access student loans or incur personal debt as a condition of participation. However, if the training program is eligible for a federal Pell Grant, the participant must apply for Pell Grant assistance. Participants may incur personal debt when agreed to and after counseling with service provider staff regarding the responsibilities associated with the indebtedness, including loan repayment.

Reimbursement Payment Structure

The Training Provider to whom the ITA voucher is issued may invoice EmployIndy for the full amount of the voucher once the course drop date has passed and the participant/student remains enrolled in the program.

Allowable Costs

ITA expenditures are costs required by the training provider to complete the training.¹³ ITA costs required to complete the training may include, but are not limited to:

- Tuition and fees;
- Books;
- Tools;
- Uniforms;
- Tests (Background Check); and
- Medical immunizations/tests.

ITA costs do not include any supportive services' costs related to the ITA, such as transportation or child care. See [EmployIndy Supportive Services Policy](#) for more details.¹⁴ Costs must be reasonable and necessary and must represent a sound investment of public funds.

Other Considerations

Selection of Training Program

¹³ DWD Policy 2017-09, "Guidance Related to WIOA Individual Training Account Funding"
https://www.in.gov/dwd/files/ITA%20Policy_final.pdf.

¹⁴ <https://employindy.org/wp-content/uploads/2017/08/3-9-Supportive-Services.pdf>.

ITAs are established on behalf of the WIOA participant to purchase a program of training services from a provider on the Eligible Training Providers List.¹⁵ Program of training services are defined as structured regimen leading to:¹⁶

- Recognized post-secondary credentials;
- Secondary school diploma or its equivalent;
- Employment; or
- Measurable skills gains toward credentials or employment.

The Eligible Training Provider List (ETPL) can be found on the INTraining website (<https://webapps.dwd.in.gov/INTraining>). Training providers must be selected in consultation with WIOA-funded Service provider staff and approved for use in Marion County/Region 12.

Sequence of Services

There is no sequence of services. Training services may be offered regardless of whether the individual has received basic or individualized services.¹⁷

Refer to *EmployIndy WIOA Training ITA Procedure* for details regarding all related procedures.

6. Exceptions

For participants who have demonstrated unsatisfactory performance under a previously established ITA, EmployIndy Career Services Manager shall determine if the individual should receive additional funds.

Contracts for services may be used instead of ITAs only when one of the following exceptions applies:

1. When the services provided are for on-the-job training (OJT) or customized training;
2. When the WIOA-funded Services Provider and EmployIndy determines that there is an insufficient number of eligible training providers in the local area; or
3. When EmployIndy determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve special participant populations that face multiple barriers to employment.¹⁸

7. Definitions

Period of Participation: The period of time beginning when an individual becomes a WIOA participant and ending on the participant's date of exit from the program¹⁹

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ U.S. DOL TEGL 19-16, "Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules", Page 5, https://wdr.doleta.gov/directives/attach/TEGL/TEGL_19-16_acc.pdf.

¹⁸ 29 U.S.C. § 3174 (c)(3)(G)(ii).

¹⁹ U.S. Department of Labor, TEGL No. 10-16, Change 1, "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs" https://wdr.doleta.gov/directives/attach/TEGL/TEGL_10-16-Change1_Acc.pdf.

Special Participant Population That Faces Multiple Barriers To Employment: A population of low-income individuals that is included in one or more of the following categories:

1. individuals with substantial language or cultural barriers.
2. offenders.
3. homeless individuals.
4. other hard-to-serve populations as defined by the Governor.²⁰

8. Related Policies and Documents

Policies

[EmployIndy Client Assessments Policy](#)²¹

[EmployIndy Background Check Policy](#)²²

[EmployIndy On-The-Job Training Policy](#)²³

[EmployIndy Drug Screening Policy](#)

[DWD Policy - WIOA T1 \(134\)-P1 On-the-Job Training Guidelines under the Workforce Innovation and Opportunity Act \(WIOA\)](#)²⁴

Documents

Financial Award Analysis (form) (See Attachment)

Additional Guidance

[Training and Employment Guidance Letter WIOA No. 10-16, Change 1](#)²⁵

[Training and Employment Guidance Letter WIOA No. 19-16](#)²⁶

EmployIndy WIOA Training ITA Procedure

²⁰ 20 C.F.R. § 663.430(b).

²¹ <https://employindy.org/wp-content/uploads/2017/08/1-2-2-Client-Assessments.pdf>.

²² <https://employindy.org/wp-content/uploads/2017/08/1-3-3-Background-Check.pdf>.

²³ <https://employindy.org/wp-content/uploads/2017/08/4-3-On-The-Job-Training.pdf>

²⁴ https://www.in.gov/dwd/files/OJT_policy_final_6-9-15_134_P1.pdf

²⁵ https://wdr.doleta.gov/directives/attach/TEGL/TEGL_10-16-Change1_Acc.pdf

²⁶ https://wdr.doleta.gov/directives/attach/TEGL/TEGL_19-16_acc.pdf

Self-Sufficiency Chart

EmployIndy defines self-sufficiency as 250% of the 2018 Economically Disadvantaged Criteria.²⁷ See the chart below for further information.

Family Size	Metropolitan Income Level	250% of the Economically Disadvantaged Criteria Guidelines ***Self-Sufficiency Level***
1	\$12,140	\$30,350
2	\$16,460	\$41,150
3	\$21,728	\$54,320
4	\$26,824	\$67,060
5	\$31,653	\$79,133
6	\$37,025	\$92,563
Add for Each Additional Family Member	\$5,372	\$13,430

²⁷https://www.in.gov/dwd/files/Publication%20of%202018%20Economically%20Disadvantaged%20Criteria_final.pdf