



CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 22-05

Effective Date: June 1, 2022

To: CWP Staff and Subrecipient Staff

From: Julie Watson, Compliance & Accountability Administrator

A handwritten signature in blue ink, appearing to read 'Julie Watson', is positioned to the right of the 'From:' field.

Issue Date: June 13, 2022

Subject: Individual Training Account (ITA) Policy for WIOA Youth Program

With this transmittal, CWP is issuing CWP's Individual Training Account (ITA) policy for the WIOA Youth program. In addition to being attached to this transmittal, CWP's WIOA Youth ITA policy can be found as policy number 5-50 in Section 5, WIOA Youth Program Policy and Procedures, in CWP's online Policy and Procedures Manual at <https://capitalworkforce.org/policies/>. Forms referenced in this policy can be found in Section 8 Forms of CWP's online Policy and Procedures Manual.

Questions regarding CWP's ITA policy for the WIOA Youth program should be addressed to Angelica Heron, CWP's Youth Services Manager, at AHeron@capitalworkforce.org.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-50	Page 1
Subject: Individual Training Account (ITA)	Effective Date: 06/01/22	

A. Purpose

ITAs provide funding for occupational skills training through scholarships for eligible individuals to increase income levels, close the skills gap and/or create employment opportunities for customers in the North Central Region. (20 CFR sections 680.300-680.340 and 681.550)

B. Definitions

Credential: Industry-recognized occupational certificate or certification including Registered Apprenticeship and Career and Technical Education educational certificates; an occupational license recognized by the State or Federal government; and other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations. Such certificates must recognize technology or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment. (TEGL 10-16 p.12 and DOL WIOA Policy Manual p. 185).

Eligible Training Provider (ETP): A training provider that has been pre-determined by the State of Connecticut to meet specific standards in order to be eligible to receive WIOA-funded payments for the provision of training to WIOA-eligible participants.

Eligible Training Provider List (ETPL): The list of training providers and their training programs that have been pre-determined by the State of Connecticut to be eligible to receive WIOA-funded payments to provide WIOA-eligible participants with training.

Individual Training Account (ITA): The mechanism for paying training providers for training on behalf of WIOA-eligible participants. WIOA-eligible participants must apply for the WIOA funds through the ITA process and meet specific criteria to be eligible. If the participant, training provider and the training are eligible for ITA funds based on this policy and the funds are available, an ITA to pay for training is established. The ITA funds are paid directly to the eligible training provider on behalf of the participant.

Individual Services Strategy (ISS): The Individual Service Strategy (ISS) is an action plan based on an objective assessment that guides a participant's progress towards a chosen career pathway through goals, objectives and services linked to program participation and performance.

C. Policy

1. ITA Eligibility Criteria

- a. Eligible Training
 - i. Training programs are assigned priority for an ITA based on the probability of the training leading to jobs in occupations in demand in the local labor market and/or increased earnings.
 - ii. CWP identifies the industry sectors and occupations in demand for the North Central Region to be used when prioritizing training programs for ITA eligibility.
 - iii. The training program must be listed along with the training provider on the ETPL.
 - iv. To be considered for funding through WIOA, a training program must lead to a recognized credential as defined by the U.S. Department of Labor.
- b. Eligible Applicant
 - i. Is age eighteen (18) or older as of the first day of training.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-50	Page 2
Subject: Individual Training Account (ITA)	Effective Date: 06/01/22	

- ii. Has been determined eligible for a WIOA program.
- iii. Has a high school diploma or GED; ITA scholarships for participants concurrently enrolled in high school completion or GED programs may be approved on a case-by-case basis (see section D.4 of this policy for procedures for approval of participants without a high school diploma or GED).
- iv. Has been determined by program provider staff to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or a wage comparable to or higher than wages from a previous employment. (CT DOL WIOA Policy Manual)
- v. Has completed the scholarship application process as prescribed by CWP.

2. Priority of Service

- a. United States Veterans and eligible spouses who have been determined eligible for an ITA scholarship based on this policy will always have priority over non-veterans for service, as defined in federal, state and CWP policy.
- b. In the event that funding is extremely limited or nearing exhaustion, after US Veterans and eligible spouses, WIOA-eligible TANF customers have the next highest priority for training.

3. ITA Recipient Application Process

- a. **Pre-requisites:** The ITA scholarship application process requires that the participant is first provided an assessment and completes an ISS that indicates that they are in need of training based on the eligibility criteria in section C.1.b of this policy and have the necessary skills and qualifications to successfully complete the selected training program.
- b. **Application Package:** The ITA scholarship application package also includes the completion of the necessary skills assessment, current résumé and an essay. Detailed steps in the application process are found in Section D. of this policy.
- c. **Evaluation:** ITA scholarship applications are evaluated on the following criteria:
 - i. Evidence that the training is directly linked to occupations in demand in the local area, or in another area to which the participant is willing to relocate.
 - ii. The alignment of the applicant's background, transferable skills, aptitudes, and interest in the training program.
 - iii. The applicant's awareness of the occupation and industry, and the applicant's readiness as described in the essay.
- d. **Documentation:** In all cases, the need for training, and the activities related to, and including, the training funded through the ITA, shall be documented in the ISS and in the required data/case management system as prescribed by CWP.

4. Customer Choice

A participant may select any WIOA-approved education and training program in the state, as listed on the current ETPL, if they meet all other criteria relating to initial and subsequent eligibility for such educational and/or training services. Individuals seeking WIOA-funded assistance have the freedom of "customer choice" in selecting the training program that best fits their personal and career needs as determined through the North Central scholarship process. (20 CFR § 680.340)

5. Additional Parameters for ITA Usage

- a. Generally, ITAs are only provided for approved training that last not more than 12 consecutive calendar months.

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-50	Page 3
Subject: Individual Training Account (ITA)	Effective Date: 06/01/22	

- b. Participants who have current academic credit toward associate or bachelor's degree programs, which can be completed within two consecutive semesters or less, may request WIOA funds to complete a degree. An academic plan from the institution detailing a course schedule that will result in degree completion within two consecutive semesters must be submitted by applicants requesting WIOA funds for this purpose.
- c. In no instance shall CWP fund all four years of a participant's post-secondary education.
- d. Funding for education and training beyond the baccalaureate level is limited to certifications.
- e. Generally, funding for ITA scholarships will not exceed \$7,500 per participant.
- f. Exceptions to the time limit and/or scholarship amount limit are only granted based on factors unique to the specific ITA scholarship application including applicant's assessment, priority of the training, fund availability and fund source limitations and priorities. Exceptions to the limitations on duration and/or scholarship amount require prior approval by the CWP President/CEO or designee.

D. Procedures

1. ITA Scholarship Submission

A participant completes the following steps to apply for an ITA scholarship:

- a. Demonstrates that the criteria described in section C of this policy are met, including:
 - i. Completing required assessments:
 - a) Reading and Math Skills Assessment; a college degree may be considered as evidence of reading and math skills in some cases
 - b) Life Domain Profile
 - c) Any other skills assessments required to enroll in the selected training
 - ii. Developing an ISS with program provider staff based on the results of the assessments and an interview with program provider staff that indicates that an ITA is needed and appropriate.
- b. Conducts research into career training programs.
- c. Selects a training program (the ITA scholarship applicant must meet the basic eligibility criteria for the training program at the time of ITA scholarship application. Training program eligibility may include criteria such as prior education and/or skill levels, a clean driving record or no criminal record.)
- d. Secures a copy of the course listing for the intended training program.
- e. Explores all available resources to pay for the cost of training or for the provision of training including training available through local program providers to ensure an ITA scholarship is needed.
- f. Applies to the training program but **does not enroll**.
- g. Applies for any financial aid that is available.
- h. Has a representative of the training institution complete the Coordination of Benefits Form and attaches a copy of proof that a FAFSA (Free Application for Federal Student Aid) was completed, if applicable.
- i. Completes and submits the ITA scholarship application which consists of:
 - i. WIOA ITA scholarship application form
 - ii. Résumé (must be typed)
 - iii. Results of assessment and including CASAS Reading and Math Scores
 - iv. Essay (must be typed)
 - v. Documentation that prerequisites for occupational training are met (e.g., standard prerequisite self-attestation, driving record, etc.)
 - vi. Consent and Release of Information forms (if applicable)
 - vii. Coordination of Benefits form
 - viii. Signed Participant Agreement

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-50	Page 4
Subject: Individual Training Account (ITA)	Effective Date: 06/01/22	

- ix. Signed Education Release Form
- x. Course listing for training program
- j. Submits the application package to the program provider frontline staff to review for completion and decision to move forward in the approval process.

2. ITA Scholarship Application Approved

- a. If approved by frontline staff, the application is submitted to the following levels of authority for review and decision in the following order:
 - i. Program provider supervisor
 - ii. Program provider manager
 - iii. CWP program coordinator
- b. If the ITA scholarship application is approved, the CWP program coordinator notifies the program provider staff. The program provider staff notifies the applicant, schedules an appointment to review funding and next steps, updates the participant's plan.

3. ITA Scholarship Application Denied

If the ITA scholarship application is denied at any point along the application process, the program provider staff informs the ITA scholarship applicant.

4. Exception to High School Diploma/GED Eligibility Requirement

Generally, to be eligible for an ITA scholarship, an applicant must have a high school diploma or a GED. This eligibility requirement helps to increase the likelihood that an applicant will be eligible for and successful in training and in post-training employment. However, exceptions to this eligibility requirement are considered on a case-by-case basis if the applicant is otherwise eligible and is concurrently in a high school completion or GED program. Approval for this exception requires that:

- a. All other eligibility criteria are met.
- b. The application process described in section D.1 of this policy is completed.
- c. The results of the Life Domain Profile (LDP) and the ISS indicate that the participant has the resources to successfully complete the training while concurrently completing high school or obtaining a GED.
- d. An ITA High School Diploma/GED Requirement Exception Form is completed describing how the results of the LDP and ISS support the conclusion that the participant will successfully complete training while completing high school or obtaining a GED.
- e. If the completed ITA High School Diploma/GED Requirement Exception Form is approved by program provider supervisor, it is submitted for review and decision by the following levels of authority:
 - i. Program provider manager
 - ii. CWP Program Coordinator
 - iii. CWP Program Manager
 - iv. CWP Program and Operations Administrator
- f. If at any point along the approval process the exception request is denied, the program provider staff informs the ITA scholarship applicant.

5. Following up on the Participant's Progress

Once a participant starts training, the program provider staff contacts them periodically to monitor their progress, to trouble-shoot and offer support, if necessary.

- a. Frequency of contact: Program staff contacts the participant within 24 hours of the scheduled training start date, and at least bi-weekly after the first contact for the duration of the training, unless the

CWP Policy and Procedure Manual

Program: WIOA Youth	Section: 5-50	Page 5
Subject: Individual Training Account (ITA)	Effective Date: 06/01/22	

participant needs more frequent support.

- b. Method of contact: Contact may be through phone calls, texts or email.
- c. Documentation of contact: Contacts with the participant and updates on the participant's progress are documented in the required data/case management systems.

6. Documentation

All the steps in the ITA scholarship process are documented in the data/case management system as prescribed by CWP. These steps include documenting eligibility, assessment, application process, monitoring of progress and acquired training certificates and/or credential.