CWP Policy/Procedure Transmittal

Policy and Procedures Transmittal Number: 22-06  Effective Date: July 1, 2022

To: CWP Staff and Subrecipient Staff
From: Julie Watson, Compliance & Accountability Administrator
Issue Date: June 28, 2022
Subject: Individual Training Account (ITA) Policy for WIOA Adult and DW Programs

With this transmittal, CWP is issuing revised Individual Training Account (ITA) policies for the WIOA Adult and Dislocated Worker programs. In addition to being attached to this transmittal, the revised WIOA Adult and Dislocated Worker ITA policies can be found as policy numbers 3-50 and 4-50 in Sections 3 and 4 respectively of the CWP online policy and procedures manual at https://capitalworkforce.org/policies/.

Questions regarding CWP’s ITA policy for the WIOA Youth program should be addressed to Shelly Henderson, CWP’s One-Stop Services Manager, at SHenderson@capitalworkforce.org.
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)

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 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 Employment Plan (IEP): An ongoing strategy to identify employment goals, objectives, and the appropriate combination of services for the participant to achieve the employment goals. The IEP is developed jointly by the participant and the assigned workforce development program provider staff.

C. Policy
1. Criteria ITA Eligibility:
a. Eligible Training
   i. 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. Identified by CWP as training in an occupation or an industry sector that is in demand in the North Central Region as documented by on CWP’s Approved Occupations Training List.
   iii. Listed along with the training provider on the ETPL.
   iv. Leads to a recognized credential as defined by the U.S. Department of Labor.
b. Eligible Applicant
   i. Resides or works in the North Central Region.
   ii. Is age eighteen (18) or older as of the first day of training.
iii. Has been determined eligible for the WIOA Adult program.
iv. Is eligible for individual career and training services.
v. Has a high school diploma or GED.
vi. 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.
vii. Completed the scholarship application process as prescribed by CWP.

2. **Priority of Service**
   a. United States Veterans and eligible spouses 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, followed by WIOA Low Income Adults.

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 IEP 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. Procedures of this policy.
   c. **Evaluation:** ITA Scholarship applications are evaluated based on:
      i. Identification 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, aptitude and interests in the training program
      iii. The applicant’s awareness of the occupation and industry, and the applicant’s readiness as demonstrated by a personal and financial plan
      iv. Applicant status as a veterans or eligible spouse.
   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 IEP and in 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.
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 customer’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 assessment results, priority of the training, fund availability and fund source limitations and priorities. Exceptions to the limitations on duration and/or scholarship level for an ITA require prior approval by the CWP President/CEO or designee.

D. Procedures

1. ITA Scholarship Application Process Steps

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

a. Attends one on one information session with program provider staff.

b. Conducts research into career training programs.

c. Selects a training program from the Approved Occupations Training List and the ETPL. (The ITA applicant must meet the basic eligibility criteria for the training program at the time of ITA 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 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.

i. Has a representative of the training institution complete the Coordination of Benefits form and attach a copy of proof you applied for FAFSA (Free Application for Federal Student Aid), if applicable.

j. Meets with program staff to complete required assessments:

ii. Reading and Math Skills Assessment

iii. Any other required skills assessments to enroll in selected training

k. 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. Coordination of Benefits Form

vii. Signed Participant Agreement

viii. Signed Education Release Form

ix. Course listing for training program

l. Submits the application package to the program provider frontline staff for review for completion and decision to move forward in the approval process.
2. **ITA Scholarship Application Approval Process**
   a. If approved by frontline staff, the application is submitted to the following levels of authority in this order for review and decision:
      i. Program provider supervisor/manager
      ii. Capital Workforce Partners 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 next steps and 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. **Following up on Training Progress**
   Once a participant starts training, the program provider staff contacts them periodically to monitor their progress 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 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.

5. **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.
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      iv. Leads 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.
      ii. Has been determined eligible for the WIOA Dislocated Worker program.
iii. Is eligible for individual career and training services.
iv. Has a high school diploma or GED.
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      iv. Applicant status as a veterans or eligible spouse.
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   e. Explores all available resources to pay for the cost of training to ensure an ITA scholarship is needed.
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