



Issued: 01/12/2024
Revised: 03/03/2025

Local Policy 2024-10, Change 2 Local Workforce Development Area 2 (LWDA2) Individual Training Account

Purpose: The purpose of this policy is to create a uniform process for issuing individual training accounts (ITAs), identify the parameters for development for our region, and to standardize the delivery of ITAs in order to allow the region to consistently provide training opportunities to participants leading to employment for an in-demand occupation under the Workforce Innovation and Opportunity Act (WIOA).

Recission: Local Policy 2024-10, Change 1 Individual Training Account Policy

References:

- DWD Policy 2017-09, Change 2 *Workforce Innovation and Opportunity Act (WIOA) Title I Individual Training Account* (All references within this policy are included by default)

Change Summary:

- This policy has been updated to better align with 20 CFR 680.230, which indicates, in part, that the use of WIOA training funds is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training or who require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

Content:

Definitions:

- 1.) In-Demand Occupation:** Indiana utilizes a scoring formula to rate occupations for both short-term and long-term outlooks to determine if the occupation is an in-demand occupation in a particular region. The formula takes into account the following job characteristics: total job openings, growth openings, percentage change, real-time online job postings, labor market information, and wages. The final score results in a rating of one (1) through five (5) for each occupation, one (1) being least in-demand and five (5) being highly in-demand. A training program must lead to an occupation rated as a three or more in the region in order to be considered "in-demand" and eligible for WIOA funding. The demand ratings will be updated periodically to reflect emerging in-demand occupations. Additionally, participants must verify with their local WorkOne that an occupation is in-demand.

NOTE: See DWD's INDemand Jobs website at <https://indemandjobs.dwd.in.gov/>

2.) Alternative Reimbursement Structure Agreement: An alternative reimbursement structure agreement may be used for training services. There must be an agreement from the training provider prior to the issuance of an ITA voucher containing these terms. Alternative reimbursement structures will vary. One example would be when the region enters into an agreement with the training provider in which it is agreed upon that the training provider would receive 70% of the training cost upon receipt if the student attended the first day of class and the remaining 30% upon student completion. There should be very clear parameters around this type of agreement, such as who will be responsible for documenting attendance on the first day of class and how completion is defined. For example, completion may be defined as persisting through the end of training and/or attaining a credential as a result of the training.

Background

An ITA is one of the primary methods through which training is financed and provided for WIOA participants. Other methods may include contracts for services, as identified in 20 CFR 680.320(a). ITAs are established on behalf of the WIOA participant to purchase a program of training services from a provider on the Eligible Training Provider List (ETPL) selected in consultation with the WorkOne/AJC staff member assisting the participant. Indiana's ETPL can be found on the INTraining website (<https://intraining.dwd.in.gov/ProgramLocation/ProgramSearchView>).

WIOA Training Funding Limitation

WIOA funding for training is limited to participants who:

1. Are unable to obtain grant assistance from other sources to pay the costs of their training;
or
2. Require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

Programs of training services are defined as a structured regimen leading to:

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

To be eligible for training services, the region must determine whether training services are appropriate for WIOA participants. Determination of appropriateness must be done by completion of an interview, evaluation or assessment, and career planning.

Assessment may include, but is not limited to, the following:

- A combination of standardized tests;
- Inventory of participants' interests;
- Skills assessment;
- Career exploration; and

- Alignment with available labor market information.

Additional factors that the region will want to consider when issuing an ITA include:

- Availability of training (dates, location, etc.);
- The cost of training;
- Time commitment of the participant;
- Fees and book costs;
- Tuition; and
- Other associated costs;

Maximum Duration of an ITA

The Northern Indiana Workforce Board (NIWB) does not impose duration limits on an ITA as this could minimize the customer's choice in the selection of a training provider.

Maximum Funding for Training

Customers are eligible to receive up to a maximum amount of \$5,000 in ITA/training voucher support per year and \$10,000 in overall WIOA financial support per lifetime. This ITA/training voucher cap will include tuition and other fees required by the training institution. In an effort to not minimize customer choice in the selection of a training provider, exceptions may be made in collaboration with NIWB and the subrecipient or subcontractor on a case-by-case basis.

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 the best utilization of WIOA funds. WIOA funds are not the payer of last resort. Once it is determined that a participant is eligible for training services, case managers must take into account the full cost of training based on the participant's needs (tuition, books, daycare, housing, transportation, etc.) and also consider the full availability of financial assistance for the participant.

Case managers are required to coordinate all funding sources available to meet the participant's needs. The coordination of funding requirement will be met by completing the Financial Award Analysis (**Attachment A**) for each participant. The Financial Award Analysis shall be uploaded into ICC. It should also be clearly indicated on the ITA voucher which funding sources are expected to be used to fund the training pursuant to the financial award analysis. For example, if the total training cost is \$7,000.00 and it is determined that the ITA voucher will cover \$2,000 of the cost and the expected Pell grant will cover \$5,000 of the cost, this should be indicated on the voucher in the "voucher comments" or wherever is most appropriate.

Note on Pell Grants: WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training OR require assistance beyond that available under grant assistance from other sources to pay the costs of such training. If a program is potentially eligible for a federal Pell Grant, the individual intending to enroll must apply for Pell Grant assistance.

Alternative Reimbursement Payment Structure

In a typical ITA reimbursement model, a training provider may invoice for the full cost of the ITA once the course drop date has passed and a student remains enrolled in the program. However, an alternative reimbursement payment structure may also be used when funding training services. NIWB requires that any alternative reimbursement structure be agreed upon with the training provider prior to implementation. DWD has developed a sample agreement from **(Attachment B)** to meet this requirement. If the training provider does not agree to the alternative payment structure, the training provider will continue to receive 100 percent of the training cost.

Allowable ITA Costs

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

- Tuition and fees;
- Books;
- Tools;
- Uniforms, including required personal protective equipment (PPE);
- Background Checks;
- Tests; and
- Medical immunizations/tests, including drug tests.

ITA costs do not include any supportive services costs related to the ITA (e.g., transportation or childcare). Costs must be reasonable and necessary and must represent a sound investment of public funds.

Other Considerations for Inclusion in Local ITA Policies

Training services must be provided in a manner which maximizes informed consumer choice in selecting an eligible provider. When participants and staff collaboratively select an eligible training provider, all other available funding sources must be exhausted before WIOA funds are utilized.

ITA Voucher Content

NIWB requires that all vouchers issued by the region on behalf of the WIOA participant shall contain the information required in ICC.

Attachment A: *Financial Award Analysis*

Attachment B: *Reimbursement Payment Structure Agreement*

For questions, contact:

Norther Indiana Workforce Board
220 Colfax Ave., South Bend, IN. 46601
admin@niwb.org

Attachment A Financial Award Analysis

TRAINING PROVIDER: _____

WIOA Participant:	Telephone:
Training Start Date:	Training End Date:
Name(s)/Type(s) of Training:	Number of Weeks/Semesters/Quarters:
Training Provider Contact Person:	Telephone and Fax:

Training Items Cost of Attendance	Fund Assignments	Cost Per - Week - Semester - Quarter	Number of - Weeks - Semesters - Quarters	Total Cost of Training Services
Application/Registration				
Tuition				
Books/Supplies				
Shop/Clinic/Lab Fees/Uniforms				
Physicals				
Licenses/Permits				
Parking Fees				
Student Activity Fees				
Transportation				
Child Care Cost				
Other Required Cost (Specify)				
Other Required Cost (Specify)				
Total Projected Cost of Training				

Available Funding Sources (Documentation)	Aid Per Semester or Quarter	Number of Weeks/Semesters/Quarters	Total Available Resources
1. Federal Pell Grant (attach Student Aid Report, etc.)			
2. Scholarships/Grants/Other Financial Aid (attach applicable award/denial letters)			
3. Other Partner Sources (Specify)			
4. Vocational Rehabilitation/Social Services			
5. Total Non-WIOA Available Resources			
6. Needed/Requested WIOA Training Resources			
7. Additional Resources Needed (normally this should be a zero balance)			

Attachment B
Reimbursement Payment Structure Agreement

SAMPLE MEMORANDUM OF UNDERSTANDING

This agreement is made and entered into by and between the Local Workforce Development Board, hereinafter referred to as the (WDB) and the Training Provider known as _____, hereinafter referred to as (Provider): and

WHEREAS: the United States Congress has established the Workforce Innovation and Opportunity Act (WIOA) and requires the WDB to provide policy guidance and oversight with respect to Workforce Development activities such as who may receive payment of Individual Training Account federal funds

NOW, THEREFORE, BE IT RESOLVED that the following agreement between the WDB and the above-mentioned training provider shall, when signed, constitute a proper and valid agreement between the two parties for the purposes of 70/30 Reimbursement Structure.

Responsibilities of the Local Workforce Development Board

The Local Workforce Development Board will:

- 1.) Enter into a Reimbursement Structure for training services;
 - a. A 70/30 reimbursement structure occurs when 70% of the training costs are payable when the participant attends the first day of class. The remaining 30% is payable upon the participants' completion of the course. The first day of class reimbursement shall be met when the student returns the signed attendance form to his/her case manager. The case manager will provide the attendance form to the student. Completion is defined as meeting all program requirements for completion.
- 2.) Provide written documentation of approved Individual Training Accounts voucher;
- 3.) Provide payment for the approved Individual Training Account voucher when submitted by a currently eligible training provider.

Responsibilities of the Training Provider

The above-mentioned Training Provider will:

- 1.) Accept a Reimbursement Payment Structure for training services;
 - a) A 70/30 reimbursement structure occurs when 70% of the training costs are payable when the participant attends the first day of class. The remaining 30% is payable upon participant completion of the course.

Equal Opportunity Provisions

The equal opportunity and nondiscrimination assurances at 29 CFR Part 38.25 apply to this contract/agreement

As this agreement indicates an accord exists between the Provider and the WDB, and disagreements between the parties affecting this agreement shall be resolved by mutually satisfactory negotiations. This agreement shall be in effect until it is replaced by mutual agreement of both parties or cancelled by either party.

We, the undersigned, an authorized representative of _____, (Training Provider) and the Executive Director of the WDB, enter into this agreement on the _____ day Of _____.

(Signature)

(Signature)

(Printed Name)

(Printed Name)

(Name of Training Provider)

(Local Workforce Development Board)

(Provider's Phone Number)

(Local Workforce Development Board Phone Number)