



Revised: 01/12/2024

Created: 11/05/2018

Subject: Local Policy 2024-10
Individual Training Account Policy

**In response to DWD Policy 2017-09, the Northern Indiana Workforce Board, INC (NIWB) will adhere to the following policy. Changes made to this policy are only regarding regional procedures and expectations.*

Statement of Policy

WorkOne occupational skills training services must be provided through the use of Individual Training Accounts (ITAs) or training vouchers. The exception to this is TAA-funded training.

Reason for Policy

To establish customer eligibility requirements to receive an ITA/training voucher and to document the process required for WorkOne Staff to issue an ITA/training voucher.

Policy Distribution List

Northern Indiana Workforce Board (NIWB) Staff
Department of Workforce Development Staff
Contracted Provided Staff

Using Individual Training Accounts in an Integrated WorkOne System

One of the principle foundations of the integrated model is that skill development activities must be available and accessible to as many customers as possible. Skill development activities can occur in a workshop, an Adult Ed classroom, or a computer lab. Skill development activities that are offered in these settings do not require the issuance of an ITA/training voucher. The only requirement is the service that matches the activity. In the case of TAA, the service is entered locally and the contract is managed through the Department of Workforce Development's (DWD) Dislocated Worker Unit.

Work experiences, on-the-job trainings, and occupational skills training at area post-secondary institutions are another important type of WorkOne skill development activity. If WorkOne resources are going to pay for some or all of the costs of occupational skills training, the customer must be issued an ITA/training voucher to cover these costs. ITAs/training vouchers may be funded with Workforce Innovation and Opportunity Act (WIOA) funds or other WorkOne funds. Depending upon how the ITA/training voucher is to be funded, the following requirements will apply.

Requirements Applying to all ITAs Regardless of Funding Source

The following requirements apply to all ITAs/training vouchers that are issued to support occupational skills training activities for WorkOne customers, regardless of whether the customer's training is being paid in whole or in part through WIOA, TAA, or another funding stream:

1. **Enrollment Requirements:** All customers to receive an ITA must participate in the Training Orientation. This Orientation can occur in either group or one-on-one settings. At the Orientation, they are given a Career Research Packet which must be completed entirely. The required assessments must be completed. The customer must complete the full WorkOne enrollment process (inclusive of signatures and scanned documentation). During this enrollment process, all such customers must be informed of the skill development and training opportunities available through the WorkOne system (including skill development workshops and skills training activities).

For customers who are to participate in ITA/training voucher activities, the ITA/training voucher concept must be explained to them in simple and understandable language.

2. **Assessment Requirements:** All customers to receive an ITA/training voucher must complete an in-depth assessment to ensure that they possess the basic skills to be successful in planned training activities. To satisfy this requirement, these customers will participate in a one-on-one assessment interview and will be required to take the complete battery of the Test of Adult Basic Education (TABE locator and appropriate level of TABE), the core three assessments in the Indiana Career Explorer (ICE) assessment system.

Exceptions to TABE Requirement

- Customers who have taken WorkKeys assessment and have scores high enough for occupation they are pursuing as defined <http://www.act.org/workkeys/occuprof/>.
- Customers who have college credit, are returning to the same institution and a transcript is provided showing proof of a minimum GPA of 2.5
- Customers that have taken a college entrance exam and provide proof that their scores are high enough that no remedial courses are needed
- Customers participating in OJT/Work Experience
- Customers participating in onsite incumbent worker training
- Customers who have taken the WIN assessment
- Customers who have successfully earned their High School Equivalency or who have been assessed at a State approved Adult Ed Program and had acceptable scores earned within the past eighteen months

3. **Individual Employment Plan (IEP) Requirements:** Once the assessment process has been completed, an IEP must be developed with every WorkOne training customer to outline the necessary steps that will enable the customer to successfully complete planned training activities and seek/retain employment. IEPs are to be jointly developed with customers and within each customer's IEP, the following four items must be included:

1. The customer's employment goal to include missing skill sets requiring training
2. Clear action steps and appropriate achievement objectives to measure customer success;
3. The appropriate combination of services required to ensure customer success; and,
4. Requirements for customer check-ins where progress can be assessed and challenges can be addressed.

IEPs for TAA customers will follow the Individual Employment Plan format as prescribed by the Region.

4. **Occupations in Demand Requirements:** All training activities for which an ITA/training voucher is to be issued must be in an occupation that is identified as a growth or high demand occupation. The list of demand occupations will be issued by the Workforce Investment Board and must be used to guide the investment of training resources. Exceptions may be made but must be requested through the appropriate Center Manager. However, even within these exceptions, all training activities for which an ITA/training voucher is to be issued must result in a wage opportunity that moves the customer towards a livable wage, defined as a wage which enables them to live without the aid of public assistance.
5. **Drug testing Requirements:** Prior to July 1, 2018, before an ITA/training voucher can be issued to a specific customer, the customer must have satisfactorily completed all drug testing requirements as required by the State of Indiana. On June 13, 2018, the Department of Workforce Development (DWD) issued a new Drug Screen Policy (Policy 2017-17) effective July 1, 2018, which no longer requires all participants to have a drug screen prior to training dollars being issues. Therefore, Region 2 will no longer require a drug screen for individuals seeking training dollars. Employers or training providers may request drug screens.
6. **Training Accessibility Requirements:** All training activities for which an ITA/training voucher is to be issued must be within a reasonable commute of the local area (defined as within 50 miles of the customer's residence). Exceptions may be made but must be requested through the appropriate manager.
7. **Obligation Tracking Requirements:** Whenever an ITA/training voucher is issued, the obligation(s) associated with the ITA/training voucher must be entered into the customer's electronic file. All expenditures associated with ITAs/training vouchers will be processed through the Workforce Development Board's accounting system and will be based upon these obligations. When the Workforce Development Board conducts monitoring activities, it will review both obligations and expenditures as one way of measuring the accuracy of ITA/training voucher payments. All vouchers must be written in the State case management system by the end of the corresponding PY of the expenditure incurred
8. **Student Loans/Debt:** Customers shall not be required to apply for or access student loans or incur personal debt as a condition of receiving an ITA/training voucher. Moreover, if a

customer elects to incur student loans or personal debt, it should only be after counseling has occurred and such counseling must be documented in case notes. In all instances, customers must be encouraged to choose a training program that provides high quality training at the lowest cost to the customer.

9. **ITA Limitations**: ITAs/training vouchers may not be used for payment of late fees, fines, or penalties caused by customer error. Additionally, ITA/training voucher funds may not be used to support general academic programs (e.g. General Studies, Bachelors of Art). Required books and educational supplies that are allowed under ITA/training vouchers must be purchased at the time of tuition payment.
10. **Required Check-Ins**: All customers who receive ITA support from WorkOne must check-in with their Career Advisor on at least a monthly basis. Such monthly check-ins will be conducted to determine how the customer is progressing through their training activity and to identify any additional supports or services that may be needed to ensure customer success. All monthly check-ins will be documented, as required, in case notes.

Requirements of ITAs Funded with WIOA Resources

ITAs/training vouchers for WorkOne customers to be funded wholly or in part with WIOA resources must meet the following requirements in addition to those requirements detailed above.

1. **INTraining Requirements**: Use of Indiana's INTraining system is required without exception. Any customer who has been determined eligible for WIOA training services must select a training provider from Indiana's approved training provider/program list (known as IN Training) after consultation with a Career Advisor. The Career Advisor shall make the list of eligible providers available to the customer by providing them with the web address of the system (https://solutions.dwd.in.gov/INTraining/search_criteria_home.htm). Additionally, Career Advisors will assist customers in making an informed choice that will enable them to obtain their desired career goals. This will include counseling on selecting the most appropriate and cost effective training option available to the customer to ensure that available training resources are utilized in a manner that best supports the customer.
2. **Low Cost Provider Requirements**: Unless there is a compelling reason to do otherwise, the training institution that offers the lowest cost for the specific training program being sought should be utilized. Career Advisors will work with customers to explore appropriate training options in making this determination. If it is determined that the customer will attend a higher cost or longer term training program, the customer must demonstrate that they have the financial resources to attend more expensive and longer term training.
3. **Pell Grant Requirements**: Customers must apply for a Pell Grant and Career Advisors must provide the customer with the information and support necessary to complete this required task. If the institution the customer plans on attending is not eligible to receive Pell Grants, a case note must be added to the customer's electronic case management file to document this fact. Depending on need and the availability of other funding, Pell Grant funds may be combined with other funds to cover the customer's total cost of education. A

customer must apply for Pell Grant funds prior to the beginning of training and this fact must be documented in case notes.

4. **Certification/Degree Requirements:** An ITA/training voucher to be funded in whole or in part with any/all resources available through WorkOne may be issued for occupational skills training that will result in an industry-recognized and reportable degree/credential or place the customer on a pathway to an industry-recognized degree/credential. This includes pre-vocational training.
5. **Continuing Education Courses:** Continuing Education and other advanced training courses may be supported with ITAs/training vouchers funded by WIOA resources if the following conditions apply:
 - The customer must have a specific occupational goal that is relative to the desired continuing education coursework;
 - The customer must have an appropriate work history or educational background which relates to the occupational goal;
 - The customer must present evidence as to how the proposed training will increase their employment prospects; and,
 - The continuing education course results in an industry-recognized and reportable credential.
 - The continuing education course may not be no more than eight weeks in total.
6. **ITA Maximums and Limits:** Customers are eligible to receive up to a maximum of \$5,000 in ITA/training voucher support per year and \$10,000 in overall WorkOne financial support per lifetime. This ITA/Training voucher cap will include tuition and other fees required by the training institution. Exceptions may be made by the Workforce Investment Board and must be requested through appropriate Center Manager.

Policies that Apply to all ITAs Funded with TAA Resources

ITAs/training vouchers for WorkOne customers to be funded with TAA resources must meet the following requirements in addition to those requirements detailed above:

1. **TAA Eligibility:** ITAs/training voucher supported with TAA resources can only be awarded to WorkOne customers who have been displaced from a TAA certified employer within the specific dates identified in the approved TAA petition.
2. **TAA Training Plan Development/Approval:** ITAs/training vouchers supported with TAA resources can only be awarded to WorkOne customers that have an approved TAA training plan. Training plans (as well as training plan modifications) can be developed by any Career Advisor working with a TAA eligible customer; however, all training plans must be approved by the Dislocated Workers Unit and this approval must be recorded by the Center Manager in a case note.

3. **TAA Training Plan Requirements:** ITAs/training vouchers supported with TAA resources must be used to support occupational skills training programs that meet the following two criteria:
 - Training must be provided at no cost to the WorkOne customer
 - Each customer is eligible to receive TAA-funded ITA support for one training plan (training plans can, however, be modified when appropriate).
 - Each customer is eligible to receive TAA-funded ITA support for one training plan per certification.

4. **TAA Training Plan Cost Requirements:** The cost of the occupational skills training to be supported with TAA resources must be reasonable as measured against the following standards:
 - The total cost of education must be considered in making this assessment, including the cost of all books, tuition, fees, supplies, fees, and travel.
 - The training institution that offers the lowest cost for the specific training program being sought should be utilized.
 - If a training plan costs substantially more than another plan suitable for the customer, then it cannot be approved.

5. **TAA Training Plan Approval Criteria:** In order to receive an ITA/training voucher supported with TAA resources, WorkOne customers must meet the following criteria to establish their need and suitability for training:
 - There is no suitable employment available for the WorkOne customer.
 - The customer would benefit from the occupational skills training activity and will be job ready upon completion of the training program.
 - There is a reasonable expectation of employment following completion of the planned occupational skills training program. This is to be documented through research of the local labor market to ensure the availability of suitable employment opportunities following training completion.
 - Additionally, an approved training program must be reasonably available and accessible to the customer and, if at all possible, within the customer's commuting area. For purposes of this policy, training is considered to be within the customer's commuting area if the training is within 50 miles (one-way) of the customer's residence. If the customer must attend training outside of their commuting area, the reasons for doing so must be documented in case notes and the customer must be paid mileage or subsistence and lodging.
 - The customer is qualified to undertake and complete the training based on evaluation of the customer's personal qualifications, including their physical and mental capabilities, educational background, work experience and financial resources to undertake and complete the specific training program being considered. Evaluation of the worker's financial ability shall include an analysis of the customer's remaining weeks of UI and TRA payments in relation to the duration of the training program. It must be noted in the customer's record that financial resources were discussed before the training was approved.
 - Training is suitable for the customer and available at a reasonable cost. Suitable for the customer means that the customer is qualified to undertake and complete planned

training activities and that the training is appropriate for the customer given the customer's capabilities, background and experience.

Guidance to voucher process:

Staff will document the need for funded service and determine availability of other funding to assist with these costs. "Documentation" of need includes appropriate services, case notes and relevant updates to ISS/IEP in Indiana Career Connect. Anytime funds are spent on a client there MUST be an update to the ISS/IEP including signatures that correspond to update.

Choose the correct customer group, verify office location, choose correct grant type if applicable, choose the actual service type (number), enter projected begin and projected end date of service. Training, Work Experience (WEX), On-the Job Training (OJT), Incumbent Worker Training (IWT), Apprenticeship remain open with projected end date coinciding with the conclusion of training or employment. For these aforementioned service types, the actual begin date is the date the client begins training. Support services and incentives are open and closed services meaning the projected begin date, actual begin date and projected end date are all the same date and coincide with the date the voucher is created.

Enter correct provider or training code (if applicable). Examples of correct provider selected when creating service (this is not necessarily the provider that will appear on voucher):

ITA – Actual Training Provider

WEX – JobWorks

Incentive Gift Cards - JobWorks

Incentives Paid via Check- JobWorks

OJTs – Employer Receiving Wage Reimbursement

Gas Cards – JobWorks

IWT – Training Provider or Employer (Dependent on who is hosting the training)

Enter "enrollment" costs for the client. Line items on this screen will vary based on service type selected. Example: ITA services will include line items for tuition, books, fees, supplies, tests. These may be auto filled based on provider however regardless of service type staff must verify all line-item costs are correct/accurate.

Financial Aid will often be marked no however client should be encourage to apply for federal PELL Grants for training services only.

Under the Budget Allocation section, after selecting [[Click Here To Select a Budget](#)] a pop-up box will appear where you will select correct fund stream. If correct customer group and county of service was selected in the earlier steps this section should only give you budgets available for those offices/customer groups. Once budget is selected it will populate under tab, staff will then click "Edit" under the action column. A pop-up box will again appear, in section title *Funded Amount you will enter amount that matches Enrollment Cost from earlier tab. Funded Amount cannot exceed available budget or enrollment costs.

Training, Work Experience (WEX), On-the Job Training (OJT), Incumbent Worker Training (IWT), Apprenticeship remain open and no closure information is entered until there is a known client status (Successful, Dropped Out, etc.) Support services and incentives are open and closed services meaning the date the service and voucher are created is the same date that will be entered on the closure screen and status marked successful completion.

Once voucher has been created staff must email MIS mailbox to alert MIS staff there is a voucher that needs to be approved. MIS will respond once voucher has been approved and “Pending Approval “status has been removed from voucher.

Once approval is given ETA will print “Approved” voucher. Voucher required for signature is printed from the Budget Planning screen under voucher number dropdown. Region will gather appropriate signatures (based on regional policy) on Approved Voucher(s). Signatures required: Case Manager, Team Lead/Supervisor and Client. Once all signatures have been collected - signed voucher and any supporting documentation (referenced in relevant processes) must be scanned and uploaded to client documents in ICC.

Regional staff is responsible for emailing voucher(s) and supporting documentation (a copy of this information was scanned into client file) to Accounts Payable AP@jobworksinc.org for processing.

JobWorks Fiscal Staff provides Voucher and supporting documentation (this includes Invoices received from vendor(s) to JobWorks Quality & Data (Q&D) for review and posting of payment in Indiana Career Connect.

Guidance as Determined by the Northern Indiana Workforce Board Resolution of August 2011:

- The final Eligibility Determination for customers, particularly when training and supportive service expenditures are being requested, falls on Subcontractor. No ITA or Supportive Services voucher will be accepted without the signatures of the Subcontractor MIS staff. Over-the-Cap expenditures approved by NIWB. Approval must have the signature of the Director of WorkOne Operations for NIWB.

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CEO

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Date Approved: 01/12/2024