



Policy Letter #8

TO: All Mid-Carolina Workforce Development Board Service Providers

FROM: Matthew Fowler, Director

SUBJECT: Individual Training Accounts (ITA)

BACKGROUND

The purpose of this policy is to provide guidelines to Mid-Carolina Workforce Development Board Service Providers with respect to the provision of Individual Training Accounts (ITAs) for WIOA eligible participants.

The following provides information on the minimum requirements for the provision of services. Service Providers may include additional elements in their local procedures, as long as they are in conformance with this policy, WIOA, DOL Regulations, and State of North Carolina Directives.

ACTION

Under Title I of WIOA, training services must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider. The Service Provider (WIOA Title I program services) will make the Eligible Training Provider List (ETPL) available to customers during one-on-one interviews, and by sharing ETPL site access information with customers who would like to research training providers on their own. Eligible individuals may select training services from the ETPL, in consultation with a career advisor, in order to maximize informed customer choice. The Service Provider will refer the individual to training and coordinate payment with the eligible training provider through an Individual Training Account (ITA).

An Individual Training Account (ITA) is a payment agreement established on behalf of a participant with an eligible training provider. The ITA is for tuition and training-related costs noted as mandatory on a course description and/or class syllabus. Training-related costs includes, books, and fees ***required*** to complete the training program.

Additional items needed by the participant to complete the course of study may also be provided, but they must be classified as a supportive service and the participant's financial need for such items must be documented through a case note in the participant's file.

When an ITA voucher is issued, it must be used within 30 days or the semester specified (curriculum and/or short-term training courses) on the voucher. If the participant does not enroll in training within the time frame on the voucher a new voucher for services will need to be issued. A case note explaining the reason for the additional voucher should be entered into the participant's file through the NCWorks Online system.

Training providers are selected by Adult and Dislocated Workers in consultation/agreement with their career advisor, after an assessment and the development of an Individual Employment Plan (IEP). Training providers are selected by Youth in consultation/agreement with their career advisor, after an assessment and the development of an Individual Service Strategy (ISS). Participants deemed eligible as In-School Youth at the time of WIOA Title I enrollment, seeking continued WIOA sponsorship must update their Individual Service Strategy to reflect successful completion of occupational/educational training and then select another institution in compliance with Local Area ITA policy.

PARTICIPANT ELIGIBILITY

To be eligible to receive an ITA, the participant must:

1. Be enrolled and in good standing with the WIOA Title I Adult, Dislocated Worker, or Youth program; and
2. Be assessed by a WIOA Service Provider staff member and be determined to need training to secure or retain employment; and
3. In consultation with a WIOA Service Provider staff member, select an approved eligible training provider that is listed on the State of North Carolina's Eligible Training Provider List (ETPL) and has been certified for the Mid-Carolina Local Area; and
4. Have an IEP/ISS in the participant file showing the need for an ITA and confirmation that completion of the training is likely to lead to employment; and
5. If the participant is an eligible Youth, assure that the training:
 - a. Is outcome orientated and focused on an occupation goal specified in the ISS;
 - b. Be of sufficient duration to impart the skills needed to meet the occupational goal; and
 - c. Results in the attainment of a recognized post-secondary credential.

PARTICIPANT TRACKING

All participants will be tracked in NCWorks Online system. Training activities shall be tracked as follows:

TRAINING SERVICE	APPROVED TRAINING PROVIDER	NCWorks Service Code	OUTCOME	INDIVIDIAL TRAINING ACCOUNT
Occupational Skills Training (OST)	ETPL	300	Credential, Measurable Skills Gain	Yes
Entrepreneurial Training*	ETPL and Non-ETPL	302	Measurable Skills Gains	Yes
OST – Special Grants	ETPL and Non-ETPL	310	Credential, Measurable Skills Gain	Yes
On-the-Job Training (OJT)*	Non-ETPL	301	Measurable Skills Gain	No
Customized Training	Non-ETPL	304	Measurable Skills Gain	No
AEL or ESL with training	Non-ETPL	222	Credential, Measurable Skills Gain	No
Registered Apprenticeship	OST = ETPL OJT = non-ETPL	314	Credential Measurable Skills Gain	Yes No
Occupational Skills Training	Non-ETPL	328	Measurable Skills Gain	No
TAA Remedial Training	Non-ETPL	333	Credential, Measurable Skills Gain	No
Youth/Young Adult OST	ETPL	416	Credential, Measurable Skills Gain	Yes
Youth/Young Adult OST	Non-ETPL	430	Credential, Measurable Skills Gain	No
Entrepreneurial Training*	Youth service = non-ETPL OST = ETPL Non-Occupational Skills Training = Non-ETPL	441	Measurable Skills Gain Credential, Measurable Skills Gain Measurable Skills Gain	No Yes No

**OJT & pre-apprenticeship for youth and young adults are considered a work experience, not training. Entrepreneurial Training for youth and young adults is one of the fourteen youth service elements and is not considered training.*

Any service that involves an Occupational Skills Training (OST), would mark “yes” for Individual Training Account in the NCWorks when entering the service

1. Adults/Dislocated Workers

a. Training Providers Listed on the ETPL

When an enrolled individual is participating in a training activity with a training provider listed on the ETPL, and all or part of the tuition is being paid for with funding from a non-WIOA funding source, and the Service Provider is paying for the remaining training related costs, he/she shall be enrolled in Occupational Skills Training – (Approved ETPL Provider) – Activity Code 300. All appropriate training related costs (including any part of the tuition not paid by non-WIOA funding source) may be charged as Training Expenditures.

Note: All training services must have the applicable training provider/course linked to the associated activity code in the participant's file through the NCWorks Online system.

b. Training Providers Not Listed on the ETPL

When an enrolled individual is participating in a training activity with a training provider that is not listed on the ETPL, he/she shall be enrolled in Occupational Skills Training (non ETPL provider) – Activity Code 328. WIOA does not allow the payment of tuition (in full or in part) through an ITA for a training provider that is not listed on the ETPL, but “training related” costs may be paid. These “training related” costs, however, may not be charged as Training Expenditures. Instead, they must be charged to the “Supportive Services” cost category, and the financial need of the individual for such services must be documented in the participant file, recorded on the Individual Employment Plan/Individual Service Strategy, and documented in case notes.

2. Youth (Out-of-School Youth, Aged 16-24 Only)

a. Training Providers Listed on the ETPL

When an Out-of-School Youth, aged 16-24, is participating in a training activity with a training provider listed on the ETPL, he/she shall be enrolled in Occupational Skills Training – (Approved ETPL Provider) – Activity Code 416. Priority shall be given to training programs that lead to recognized post-secondary credentials, and that align with in-demand industry sectors or occupations in the local area. Costs shall be charged as program expenditures on the monthly invoice.

b. Training Providers Not Listed on the ETPL

When an Out-of-School Youth, aged 16-24, is participating in a training activity with a training provider that is not listed on the ETPL, tuition payments cannot be made with WIOA funding. The participant shall be enrolled in *Enrolled Post-Secondary Education – Activity Code 430*.

The participant can be assisted with books, fees (not tuition), school supplies, and other necessary costs, and these costs shall be charged as “Supportive Services,” on the monthly invoice and the individual’s financial need must be documented in the participant file by including the financial need on the individual employment plan/individual service strategy; and, recorded in case notes. Youth receiving this type of supportive service shall be enrolled in Supportive Service: *Post-Secondary Academic Materials – Activity Code CSS and 429*.

3. Youth (In-School Youth, Aged 14-24)

WIOA funds may not be utilized to provide ITAs to In-School Youth. In-School Youth may, however, be assisted with books, fees (not tuition), school supplies, and other necessary costs, and these costs shall be charged as “Supportive Services,” and the individual’s financial need must be documented in the participant file. Youth receiving this type of supportive service shall be enrolled in *Supportive Service: Post-Secondary Academic Materials – Activity Code CSS*.

In-School Youth who are attending post-secondary education that the Service Provider is supporting through supportive services as outlined in the previous paragraph should also be enrolled in *Enrolled Post-Secondary Education – Activity Code 430*. Even though the Service Provider is not paying tuition on behalf of this participant, they are supporting the youth through this activity. As with any youth (In-School or Out-of-School) enrolled in *Enrolled Post-Secondary Education – Activity Code 430*, monthly progress reports are required for as long as the youth is participating in post-secondary education and is enrolled in the WIOA program.

TIME PERIOD FOR USING THE VOUCHER

When the voucher is issued it must be used within 30 days or the semester specified (curriculum and/or short-term training courses) on the voucher. If the participant does not enroll in training within the time frame on the voucher; a new voucher must be created, uploaded into the participant’s file through NCWorks Online System, and recorded in case notes.

A participant will be allowed two years to obtain their credential; however, this could be longer depending on the number of developmental courses needed by the participant. No more than 12 credit hours of remedial classes will be approved.

PAYMENTS

Payments will be made directly to the training provider. Payments may also be made incrementally, through payment of a portion of the costs at different points in the training course.

REQUIREMENTS/LIMITATIONS

- A. The individual dollar amount of each ITA varies based upon participants’ needs, but the aggregate total cost shall not exceed the lifetime CAP of \$8,000 per participant. In

order to track the total participant costs, career advisors will need to case note in the NCWorks Online system each ITA issued and the aggregate participation-to-date costs.

- B. ITAs are normally issued for providers that appear on the North Carolina's ETPL. If it can be justified to utilize a training provider in another state, the provider must be listed on the ETPL of its home state, and documentation of this listing must be included in the participant case file. This justification must be approved by the Mid-Carolina Workforce Development Board Executive Director prior to ITA being initiated and documented by a supporting case note.
- C. The Service Provider shall develop and implement an Individual Training Account process that reflects local area policy/procedure, including any additional restrictions beyond those outlined in this policy statement.
- D. It is the responsibility of the WIOA Service Provider to appropriately monitor a participant's progress in occupational classroom training (at least once each calendar month) and assure timely collection of tuition refunds (as outlined in the training vendor's refund policy) when the participant is unable/unwilling to complete the training program.

MONITORING

In order for the Mid-Carolina Workforce Development Board to monitor each participant's lifetime CAP, the Board is requesting the bi-weekly attendance sheets and (ITA) vouchers to accompany the monthly invoice along with a detailed fiscal tracking mechanism/report for demonstrating fiscal obligations for the remainder of the project term.

The Mid-Carolina Workforce Development Board may review a sample of charges included in an ITA during on-site and desk reviews to ensure compliance with this policy. Any costs that the Mid-Carolina Workforce Development Board determines should not have been included as part of the ITA may be questioned, and Service Providers will have an option to transfer the charges to the Supportive Service cost category or pay for them with non-WIOA funding.

POLICY EXCEPTIONS

The Mid-Carolina Workforce Development Board Service Providers may make exceptions to this policy only with prior written authorization from the Mid-Carolina Workforce Development Board Director.

References

**Federal Register §680.230
TEGL 19-16**

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July 2022

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January 2024