

North Central Counties Consortium

INDIVIDUAL TRAINING ACCOUNT PROCEDURE

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Exhibit:

- A. ITA Voucher Example
- B. Training Cost Application Example

North Central Counties Consortium Individual Training Account Procedure

I. Introduction

The Individual Training Accounts (ITA) may be established on behalf of Workforce Innovation and Opportunity Act (WIOA) adults and dislocated workers. This procedure gives guidance for the minimum requirements for local systems in the development of the ITA Voucher.

This procedure applies to all NCCC service providers, including mandated partners, who provide training services through the One Stop delivery system to eligible individuals funded under Title I of the Workforce Innovation and Opportunity Act (WIOA).

II. References

WIA Section 134 Use of Funds for Employment and Training Activities
Required Local Employment and Training Activities
WIOA Section 194(12), General Program Requirements
Federal Register/Proposed Rules 680.210
Federal Register/Proposed Rules 680.230, Coordination of WIA Training Funds
Federal Register/Proposed Rules 680.300-340, Individual Training Accounts
Federal Register/Proposed Rules 681.550, Youth Eligibility ITA usage
WIAD04-4, Recovery of WIA Tuition and Training Refunds
WIAD06-21, Workforce Training Act (SB 293) Implementation
WSD 14-1, WIA Training Expenditure Requirements
NCCC Policy #14, Individual Training Account Policy
NCCC Policy #15, Referral to Training Services
NCCC Policy #03, Procurement
Senate Bill No. 734, State and Local Workforce Investment Boards: Funding

III. Prohibitions and Limitations

Individual training accounts are not necessary under the WIOA youth program. Reference the NCCC Administrative Procedure #03, Individual Referral and Occupational Skills Training for Youth Procedure.

Under the WIOA, access to training or any other services is not an entitlement. [Ref: WIOA 94(12)]

IV. NCCC Procedural Guidelines

Training services (other than those discussed in section VI.) shall be provided through the use of Individual Training Accounts (ITAs) as outlined within this document and shall be provided to appropriate eligible individuals through the One Stop delivery system.

Workforce Innovation and Opportunity Act (WIOA) training services through the ITA process may be offered to eligible adult, dislocated workers and out-of-school youth who are 18-24 years old.

Training and the development of the ITA is provided after the One Stop staff has conducted an interview, evaluation or assessment and career planning and a determination has been made that the individual:

- Is in need of training to obtain or retain employment that leads to economic self-sufficiency;
- Has the skills necessary to succeed in the training;
- Has selected a program that is directly linked to employment opportunities;
- Is unable to obtain or requires assistance beyond the assistance made available under other grant assistance (including PELL);
- Has met the priority system under the funding grant.

Training services shall be provided in a manner that maximizes consumer choice in the selection of an eligible provider of such services. [Ref: WIOA 134(c)(3)(F)]

V. Training Providers Subject to the ITA Process

In order for a participant to use a WIOA ITA Voucher the provider and the provider's program(s) must be listed on the Eligible Training Provider List.

VI. Exclusions to the ITA Process

There are some training programs that are exempt from the development of an Individual Training Account. These trainings are:

- On-the-Job Training and Customized Training (as defined by the WIOA).
- Contract training providers that do not charge clients directly for their services must be listed on the ETPL, but are subject to different criteria specified in their contract with the local board.
- Non-WIOA Funded Training: where the training costs are paid by non-WIOA Title I funds, e.g. BOG, Pell, etc.
- Trainings offered under Individualized Career Services: Short Term Prevocational Services are defined in WIOA as services that prepare individuals for unsubsidized employment or training and/or the development of learning skills. These services are considered to be Intensive Services and the development of an ITA is not necessary. All Short Term Prevocational Services are paid through Supportive Services. [Ref: NCCC Procedure #8, Supportive Services]

NOTE: Training providers that charge any fees, registration fees etc. are required to be on the ETPL (EDD response to question emailed dated 7/23/2009).

VII. Service Provider Program Requirements

NCCC service providers must develop *local systems* to ensure that trainings being supported with WIOA funding meet the following requirements.

ITA Vouchers: An ITA voucher must be developed for all eligible participants who are in need of training supported by WIOA. Exceptions are discussed in Section VI., Exclusions from the ITA Process, of this procedure.

Approved Providers: Service providers must ensure that ITA Vouchers are developed for trainings with vendors/courses listed on the Eligible Training Provider List.

Process for Payments of Training: Service provider is responsible for processing all payments to eligible training providers.

Tracking Expenditures: Ensure that training expenditure payments are charged to the correct grant/funding stream.

Participant Enrollment: Ensure that participants are enrolled and recorded in the correct funding stream and correct activity code before payments are processed for ITAs.

Actual Costs and Refunds: Ensure when paying for training and training-related expenses, actual costs are paid and that any refunds are returned in accordance with ITA Refund Procedure section of this document.

Budget Statements: For each participant receiving WIOA funding for training a budget statement must be developed and maintained by the service provider. The requirements for the development of the Participant Budget Statement are outlined in the NCCC Eligibility and Case Management Process Procedure.

Individual Service Strategy: It is a requirement of WIOA to develop a service strategy with participants who are served beyond core services. The required components of the service strategy for participants receiving training services are outlined in NCCC Eligibility and Case Management Process Procedure.

Self Sufficiency: The participant's training will lead to unsubsidized self sufficient employment and must be documented in the file, at a minimum, case noted in the file.

Supporting Demand Occupations: Participant files must have documentation that the training is a demand occupation and that the training is directly linked to occupations that are:

- Demand occupations¹ in the local area, or in another area to which an individual is willing to relocate; *or*

¹ Demand occupations for NCCC are those occupations for which there are known job openings.
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- Directly linked to the NCCC Governing Board (GB)/Workforce Development Board (WDB) Targeted Industries Clusters²; *or*
- Listed on EDD Labor Market Information as growing; *or* [Ref: WIA 134(d)(4)(G)(iii)]
- Occupations that are emerging.

Coordination of WIOA Training Funds: The availability of other funding resources, e.g. TANF, Pell grants, and other federal and state funding, shall be investigated and if applicable, included in the development of the ITA. The efforts to investigate other funds must be documented in the participant file. [Ref: WIA Final Rule Sections 663.320b&c and 663.420b&c]

Record Retention: The ITA Voucher and all payments must be maintained per NCCC Procedure #06, Record Retention Procedure.

Procurement: for training costs with a vendor other than the training site listed on the ETPL, purchases must follow the NCCC Policy #03, Procurement. These expenditures are generally considered “Small Purchases” and should follow the methods of solicitation in section B of the NCCC Policy #03, Procurement which states:

For small purchases, two or more quotes or prices must be obtained for purchases ranging from \$1.00 to \$9,999. Prices/quotations can be obtained from catalogs, current price lists, prior receipts, or contact (in person, telephone, fax or e-mail) with vendors. A “Vendor List” should be established utilizing hard copy catalogs and price lists updated at least annually, however real-time Internet research is preferred. One technique that a buyer may use is called “historical pricing.” With historical pricing, a buyer is able to demonstrate that other transactions occurring in the past 12-18 month period shows that historical prices for similar acquisitions have yielded no material change in cost.

A vendor list containing the names and addresses of organizations which are prequalified for the provision of goods and/or services is required for the NCCC Administrative Office and subrecipients. Each entity shall maintain a vendor list.

Each entity shall update their vendor list at least annually and shall include but not be limited to those vendors in good standing whose goods/services have been purchased through the NCCC procurement process as outlined in this policy.

It is the responsibility of the AJCC and staff approving the Supportive Service that all procurement standards are met. Requirements for procurements using WIOA funds are outlined in WIA Directive WSD12-10 and NCCC Policy #03, Procurement.

NOTE: for many fees and testing the item or service is available from only one source (sole source).

NOTE: the above process is required for both vendor payments for participants AND for participant reimbursements.

² NCCC GB and WDB priority industry clusters
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VIII. ITA Voucher Development

An ITA Voucher must be developed by the service provider for eligible participants who are in need of occupational skills training and the training is being supported by WIOA. The ITA Voucher outlines how WIOA and other resources (if applicable) will support training expenses. Service providers may choose to design their own format for the ITA Voucher but must, at a minimum, include the information contained in the attached Individual Training Account Voucher (with the exception of the area entitled “Local Use Only”). (Exhibit A)

IX. ITA Amendments

If an amendment is required in the event that the terms of the ITA are changed, i.e. training program, training hours, start and end dates and/or training costs. Amend the ITA Voucher as follows:

- Identify all amended information with an asterisk;
- Complete Amendment No. at top of the ITA;
- Included short explanation for amendment.

All the information in the amended voucher should be consistent with the initial voucher or the previous amendment, except for the information currently being amended.

X. ITA Amounts and Duration

NCCC Policy #14, Individual Training Account Policy states that ITAs written within NCCC may not exceed the following restrictions:

- ITA may not exceed ten thousand (\$10,000) dollars
- Maximum training time may not exceed twenty-four (24) months. A service provider must request, in writing, and receive permission from the NCCC Administrative Office to exceed the dollar amount or duration.

XI. ITA Voucher Payment System

Payments from ITA Vouchers may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments may also be made incrementally; through payment of a portion of the costs at different points in the training course. [Ref: WIA Final Rule 663.410]

Local systems must develop systems for paying/redeeming Individual Training Account Vouchers. Service providers may use the ITA Voucher as a document sent to a vendor to secure a participant’s placement in training programs and/or the document may be used to document payment of the training costs. Service providers may also use the attached Training Cost Application (Exhibit B) to document payments for items listed on the ITA Voucher (procurement information must be on the document).

Reimbursement and payments for training costs must be outlined on the ITA Voucher, e.g. tuition, required books, supplies, application/registration fees, etc. The service provider's payment system must assure that supporting documentation is collected and maintained for the payment or reimbursement, including:

- An original invoice/receipt is used for payments or reimbursements;
- The invoice/receipt is accurately and fully completed including, vendors name, invoice date, date expense was incurred, itemized list (if applicable) and total amount due;
- The invoice amounts must be consistent with the ITA and the provider's documented training cost and payment schedule, e.g. monthly, quarterly, thirds, at registration, upon completion, etc

XII. Collection of Training Documentation

The service provider is required to collect attendance and progress reports from the training provider on each participant and to obtain a copy of each participant's certificate of completion, diploma, etc. The collection of these documents is to assure that training is being provided and that participants are benefiting from the training. Copies of these documents must be maintained in the participant's file.

XIII. ITA Refund Procedure

A refund policy must be in place when trainings are financed through ITA Vouchers. Service provider staff will ensure that the refund policy of the training provider is reviewed and includes the following elements:

- Percentage of the advanced payment to be returned upon non-completion of courses;
- Turnaround time of refund;
- Time spent in training before a refund will no longer be honored;
- Requirement for the training provider to notify the service provider staff of early participant dropout.

The procedural steps required of NCCC service providers for early termination of an ITA include:

- The service provider staff is responsible for acknowledging and determining that a refund is due for early termination of a participant's training;
- The service provider staff is responsible for ensuring prompt return of any unused training monies;
- The service provider staff is responsible for the collection process of any outstanding training and/or tuition refund;
- Make all refund checks payable to the service provider. If local system is in place the refund(s) must be credited back to appropriate grant.

Grant Code: _____
 Voucher No. (Optional) _____
 Amendment No. _____

**Individual Training Account (ITA) Voucher
 (EXAMPLE)**

The participant named below is eligible to receive Workforce Innovation and Opportunity Act (WIOA) funded training services identified in this voucher.

WIOA SERVICE PROVIDER CONTACT INFORMATION

One Stop: _____ Address: _____
 Staff Contact: _____ Phone Number: _____

PARTICIPANT

Name: _____ Soc.Sec. # (or part of) _____
 Address: _____ Phone: _____

TRAINING INFORMATION

Training Provider: _____
 Address: _____
 Contact Person: _____ Phone: _____
 Training Program: _____ Total Training Hours: _____
 Start Date: _____ Estimated Completion Date: _____

COST CALCULATION

TRAINING COST	TOTAL	WIOA	PELL GRANT	OTHER FUNDS	
				AMOUNT	SOURCE
Tuition					
Registration Fee					
Books/Supplies					
Test/Application Fees					
Other: (list) _____					
TOTAL					

ITA Vouchers shall be paid or reimbursed using local system fiscal procedures.

SERVICE PROVIDER STAFF APPROVING THE ITA VOUCHER AND/OR PAYMENT

 Signature of Service Provider Staff Title Date

LOCAL USE ONLY		
<input type="checkbox"/> Reimbursement	Voucher Amount Payment Amount:	Payment to:
<input type="checkbox"/> Check/Purchase Order		

TRAINING COST APPLICATION (EXAMPLE)

1. Date:	2. Participant Name:	3. Last 4 digits of SS#:
Training Costs: NCCC allows payment of training costs off this application if the individual is enrolled in a training activity and the below costs are required for the training.		
4. Training Activity Code: _____ Funding Source: _____		
5. Training Needs (please check appropriate box and insert training expenditure amount: <input type="checkbox"/> Required Fees \$ _____ <input type="checkbox"/> Required Books \$ _____ <input type="checkbox"/> Required Supplies \$ _____ <input type="checkbox"/> Test/Application Fees \$ _____ <input type="checkbox"/> Other (please note in box 6) \$ _____		
6. Comments:		
7. <input type="checkbox"/> Check or <input type="checkbox"/> Purchase Order Amount:	Amount: \$ _____	
8. Make Check or Purchase Order Payable to:		
9. Local Agency Use:		
10. Name of Case Manager:		11. Reviewed and Approved by:
12. Procurement <input type="checkbox"/> Two quotes obtained for each item, quotes attached to this application <input type="checkbox"/> The vendor is on the local Vendor List.		