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August 12, 2021

May 21, 2021

Effective: March 4, 2021

To: All WIOA and Other Subrecipients of the Orange County
Workforce Development Board

From: Carma Lacy
Director of Workforce Development

Subject: Individual Training Account (ITA) Policy
Information Notice No. 21-OCWDB-05
Supersedes Information Notices 16-OCDB-05

PURPOSE

This policy is to identify the parameters of the Individual Training Account (ITA) and to standardize the delivery of ITAs through WIOA Title I program Service Providers and all other applicable providers who administer ITAs. Orange County Workforce Development Board (OCWDB) uses the online database, I-TRAIN, to list eligible training providers.

EFFECTIVE DATE

This notice is effective on the date of issuance.

REFERENCES

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Sections 108, 134(a)(3)(A)(xii), and 134(c)(3)
- Workforce Innovation and Opportunity Act §134, Pub. L. 113-128
- Jobs for Veterans Act, Pub. L. 107-288
- 20 C.F.R. 675.300, 680.140(b)(6), 680.200-230, 680.300, 680.320-680.340, 680.420, 680.470, 680.600, 680.650-660, 681.480, and 683.500-683.510
- 29 U.S.C. 3101 et seq.
- 38 U.S.C. 4213
- USDOL, Training and Employment Guidance Letter (TEGL) 08-19, *WIOA Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs* (January 2, 2020)
- USDOL, TEGL WIOA No. 19-16, *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Services (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules*, (March 1, 2017)



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- USDOL TEGL 13-16, *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA)*, (January 12, 2017)
- EDD Workforce Services Directive No. WSD19-10, *Directive on the Recovery of WIOA Tuition and Training Refunds* (February 20, 2020)
- EDD Workforce Services Directive No. WSD15-07, *Directive on requirements for training programs listed on the Eligible Training Provider List (ETPL), WIOA Eligible Training Provider List – Policies and Procedures* (November 10, 2015)

BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) requires that training services are provided to all eligible Title I Adults, Dislocated Workers, Youth, and other program specific participants. In Orange County, an eligible training program is based on the State of California Eligible Training Provider List (ETPL) and I-TRAIN using Individual Training Accounts (ITAs). The intent is to maximize informed customer choice in the selection of qualified training providers. Once an eligible training selection is made using I-TRAIN, the case manager is expected to arrange for payment of services through an ITA. Use of I-TRAIN and an ITA is required for classroom training and may include apprenticeship training or other training options.

Definitions

Appropriateness - The possession of qualities that are right, needed, or suitable for training services.

Basic Skills Deficient - An individual who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Eligible Training Provider - An entity that receives funding for training services through an ITA; must be included on the State of California Eligible Training Provider List (ETPL) and I-TRAIN and provide training services.

Family - Two or more persons related by blood, marriage (including same-sex marriages), or decree of court, who are living in a single residence and are included in one or more of the following categories:

1. A married couple and dependent children;
2. A parent or guardian and dependent children; or
3. A married couple.

Family Self-Sufficiency - An economic standard that uses a combination of family members' incomes to determine whether the participant has the means to fund training services. OCWDB Self-Sufficiency Policy.

In-Demand Industry Sector - An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the state, regional, and local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors as listed in OCWDB Demand Occupation Criteria Policy.

In-Demand Occupation - An occupation that currently has, or is projected to have, positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector that has a significant impact on the state, regional, or local economy as listed in the OCWDB Demand Occupation Criteria Policy.

Individual Employment Plan (IEP) – An IEP is an individualized career service jointly developed by the participant and career planner that identifies the participant's employment goals and determines service needed for the participant to reach the employment goals.

Intrastate Training Resource and Information Network (I-TRAIN) – The online, searchable database used by South Bay Workforce Investment Board (SBWIB) that includes the training program information (such as contact name, location, accessibility, accreditation, and availability of financial aid) for approved training programs in the Southern California region. (<https://wioa.i-train.org/>)

Local/Orange County ETPL – The training program list maintained by the ETPL Appointee that has been vetted and approved for use by OCWDB Service Providers.

Occupational Skills Training - An organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at the entry, intermediate, or advanced level, and results in attainment of a recognized post-secondary credential.

On-the-Job Training (OJT) - Training by an employer that is provided to a paid participant while engaged in productive work in a job that:

1. Provides knowledge or skills essential to the full and adequate performance of the job;
2. Is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, except as provided in section 134(c)(3)(H) of WIOA, for the extraordinary costs of providing the training and additional supervision related to the training; and
3. Is limited in duration as appropriate to the occupation for which the participant is being trained, considering the content of the training, prior work experience of the participant, and the service strategy for the participant.

Priority Population - Individuals who have barriers to employment, are on public assistance, and who are basic skills deficient are given priority to receive individualized career services and training services. This priority must be consistent with priority of services for veterans and eligible spouses.

Pre-Apprenticeship Skills Training - A program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership (letter of commitment) with at least one, if not more, approved apprenticeship program(s). In California, the apprenticeship partner must be approved by the California Department of Industrial Relations, Division of Apprenticeship Standards (DIR/DAS). Such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a registered apprenticeship program.

Self-Sufficiency - An economic standard that specifies the income needs of families, by family size, the number and ages of children in the family, and local area geographical considerations. OCWDB Self-Sufficiency Policy.

Policy & Procedures

Individual Training Accounts (ITA) are a training option made available to eligible participants when it is determined that it will be unlikely that the participant will be able to obtain or retain reemployment which leads to self-sufficiency or higher wages from previous employment through basic career services alone. An ITA is limited in cost and duration and must result in employment that leads to economic self-sufficiency or wages higher than those from previous employment. ITAs are not entitlements and shall be provided only to eligible participants on the basis of an individualized career assessment. Participants shall choose career training with Eligible Training Providers who are on the online database, I-TRAIN.

The Service Provider's Case Manager should refer the individual to the online database I-TRAIN for an eligible training program and coordinate payment with the training provider through an ITA. The ITA is a payment agreement established on behalf of a participant seeking training, to purchase training services from eligible training providers. Only those training providers that are on I-TRAIN and are approved for use of WIOA are able to redeem ITAs for payment. When participants select an eligible training provider, they are required to seek out providers who offer financial aid assistance to ensure best utilization of Workforce Innovation and Opportunity Act (WIOA) and other County program funds as applicable.

Eligibility for Training Services

To be eligible for training services, program staff must determine whether adult, dislocated worker, or out-of-school youth participants (ages 16 to 24) are appropriate for training services.

1. Evaluate Appropriateness to Receive Training Services

- Determination of appropriateness should be done by completion of an interview, evaluation or assessment, and career planning in coordination with the IEP/ISP.
- Assessments may include, but not be limited to:
 - A combination of standardized tests;
 - Inventory of participant's interests, skills assessment, career exploration; and
 - Available labor market information.
- Training services may be provided to adults, dislocated workers, or youth who, after an interview, evaluation, or assessment and career planning, have been determined to:
 - Be unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher wages received from previous employment even after receiving WIOA career services;
 - Be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages received from previous employment;
 - Have the skills and qualifications to successfully participate in the selected training services programs;

- Select training services programs that are directly linked to employment opportunities in the local area or the planning region, or in another area to which adults, dislocated workers, or youth are willing to commute or relocate;
- If applicable, be a member of a worker group covered under a petition for Trade Adjustment Assistance (TAA) who are awaiting a determination; and
- Be determined eligible and are members of a priority population if training services are provided through adult program training services.

2. Informed Customer Choice

ITAs will be provided in a manner that maximizes informed consumer choice in selecting an Eligible Training Provider in accordance with the goals and objectives outlined in the participant's IEP. Service Provider staff assist customers with career choices; however, the ultimate decision rests with the customer. The career assessment should measure the participants job readiness, employment and training needs, financial, social and supportive needs, and potential for successful completion. Priority consideration shall be given to programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area as identified through the use of Labor Market Index (LMI), local in-demand industries and local in-demand occupations.

After general eligibility documentation has been collected, a participant may be provided career services. If it is determined that a participant requires training in order to obtain employment, an initial and comprehensive assessment must be administered to determine that the participant's skill set is comparable to the level of completing training successfully. A second interview will take place to gather all required ITA and training documentation to justify financial assistance needs.

3. Determining Self-Sufficiency

- As part of the determination of the appropriateness for training services, the Service Provider must review "family self-sufficiency" for participants seeking an ITA. ITAs may only be approved for those who were determined during WIOA enrollment to be below the Self-Sufficiency standard.
- Out-of-school youth must also be screened for dependency status. Refer to OCWDB Dependent Status Policy for guidance on determining dependency status. If a youth is determined to be dependent, Self-Sufficiency would include the income(s) of all family members, including the youth's parent(s). Self-Sufficiency is determined during WIOA enrollment.
- WIOA eligible adults who are over the Self-Sufficiency standard are not eligible for ITAs. Other WIOA services may be provided, as appropriate. They may also be served using other WIOA funds, if eligible.

4. Extenuating Circumstances for WIOA Adult-Funded ITAs

- If a participant's family income exceeds the "Self-Sufficiency" standard, a participant may still receive an ITA if extenuating circumstances exist. When evaluating extenuating circumstances, the costs related to the economic hardship must be the responsibility of either that person or that of his or her legal dependent, spouse, or parent. Those costs must be ongoing and expected to cause a financial hardship for the duration of the ITA.

- Economic hardships include, but are not limited to:
 - The portion of medical procedure or prescription medication costs that are not covered by insurance and are ongoing and determined to be medically essential;
 - Health insurance premium payments that are not paid for by private or public sources;
 - Payments on past due or back mortgage, rent, or essential services (e.g., electric, water, natural gas, propane, and other utility arrearages) that accumulated because of involuntary unemployment or underemployment;
 - Court-ordered child support or spousal payments;
 - Ongoing payments to a nursing home, home health care provider, elder care provider, or assisted living provider; or
 - Payments toward debt that accumulated due to a natural disaster, severe illness, or disability.
- Extenuating circumstances do not include normal rent, mortgage, utility, automobile, fuel, grocery, credit card, or "pay-day loan" payments.
- Exceptions may be approved on a case-by-case basis for individuals whose family income exceeds the family self-sufficiency standard. Documentation explaining the extenuating circumstances must be maintained in the participant file, along with the approval from the Orange County Director of Workforce Development

When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for veterans or transitioning service members.

Coordinating ITAs with Other Sources of Funding

Funding for training is limited to participants who are either unable to obtain grant or financial assistance from other sources to pay the costs of their training; or those that require assistance beyond what is available under grant or financial assistance from other sources to pay the costs of such training. The Service Provider Case Manager will consider the availability of other sources of grants/funding to pay for training costs so that WIOA funding is used to supplement other financial sources including but not limited to other Federal, State, local, private job training programs, scholarships, financial assistance, Pell Grants, or TAA. In making the funding determination, the Service Provider Case Manager will take into account the full cost of participating in training services, including the cost of supportive services and other appropriate costs. The participant is required to submit documentation of the award and acceptance or denial of Federal, State, local, or private financial assistance to the Service Provider Case Manager during the eligibility determination period for training.

A participant may enroll in trainings that are funded by WIOA while an application for any financial aid is pending as long as the Service Provider has made arrangements for reimbursement with the training provider and the participant regarding allocation of any financial aid or other financial source, if it is subsequently awarded. In that case, the training provider must reimburse the Service Provider any funds used to underwrite a training for the

amount covered by financial aid or other source, including any education fees the training provider charges to attend trainings. Should a student not complete a program for any reason, the standard refund policy of the training institution will be applied in accordance with the "Recovery of Tuition Funds" section.

Training benefits funded by the Veterans' Administration (VA) are not included in the category of "grant assistance from other sources" and eligible veterans and spouses are not required to coordinate their entitlement to those benefits, including the GI Bill, with their eligibility for trainings that are funded by WIOA. VA benefits for education and training services do not constitute "other grant assistance" under WIOA's eligibility requirements. Therefore, eligibility for VA benefits for education or training services do not preclude a veteran or the veteran's eligible spouse from receiving WIOA funded services, including training funds. Service Providers may not require veterans or spouses to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training.

ITAs In Conjunction with On-the-Job Trainings (OJTs) or Registered Apprenticeship

ITAs may be provided to individuals in conjunction with On-the-Job Training (OJT) funds when appropriate, and the ITA may be used before or during. While registered apprenticeships automatically qualify to be on a State's ETPL, they may not always be listed because apprenticeship programs have the authority to decide if they want to be included or not. ITAs can be used for the following apprenticeship-related costs:

1. Tuition, books, and related for pre-apprenticeship training
2. Tuition, books and related for classroom training that is part of the apprenticeship

Duration of ITA

The duration of an ITA is determined by a participant's course of study. Short-term and long-term trainings for participants must be attainable. Short-term trainings are those completed in 12 months or less and are the preferred programs. Long-term trainings cannot exceed 24 months. Bachelor degree programs may be funded only if a participant can successfully document that he or she is in the last 2 years of a training program (e.g. remaining hours are equal to or less than 50 percent of the total credit hours required for the degree) and is in an in-demand occupation. The classroom training portion of the Registered Apprenticeship programs may be up to 4 years in length. Because of the benefits of a registered apprenticeship program, including an established career pathway and simultaneous employment, WIOA may fund the full length of the training.

When determining the length of a training, local areas must consider a participant's career pathway and the services necessary to achieve the participant's goal. For example, the classroom training portion of a Registered Apprenticeship program is typically longer than a year. This training is a part of a career pathway involving longer training and simultaneous employment for the apprentice.

If a participant is unable to complete the training program within the timeframe outlined in the ITA, the ITA may be extended. All exceptions must be approved prior to implementation of extension by the Orange County Director of Workforce Development. There are some instances when more time may be warranted, including but not limited to:

1. A participant's military service or military-related leave time;
2. Lack of availability of classes;

3. Cancellations of classes; or
4. Unforeseen illness of the participant or an immediate family member of the participant. For the purposes of this policy, immediate family members include the participant's parents (including step-parents), spouse, domestic partner, and children (including step-children or children who the participant has been awarded custody of through a court).

Participant Research and Physical Site Visit

Upon completion of an assessment and following the identification of the need for training, a participant shall conduct research on three training providers from I-TRAIN information available from Service Provider staff, and the internet.

The participant is required to complete a physical site visit at a minimum of one school to determine if the facilities are adequate and accessible. The participant must consider transportation, classroom setting, and if applicable, necessary accommodations for persons with disabilities.

If a training is online, the participant must have consistent access to a computer and any necessary equipment to complete the course. The case manager must document the reason for choosing an online course within case notes located in either CalJOBS, participant case notes, or in the program's monthly reports.

Financial Literacy

Any participants who are requesting training shall have completed either the FDIC Money Smart workshop or FDIC Money Smart Computer Based Training prior to receiving training. OCWDB Financial Literacy Policy provides additional guidance for implementing career services.

ITA Funding

Service Providers are allocated ITAs through budgeted line items within the contract. Budgets may increase or decrease based on system training needs and funding availability. It is the responsibility of the Service Providers to manage, track, and report ITA funding.

1. Cost Limitations

The cost limit for an ITA is \$6,500 for the lifetime of the participant. The maximum ITA limit is not an entitlement. The amount and duration of each participant's ITA award is determined on an individual basis. Funding amounts will consider the total costs of the selected training program, any other financial assistance available to the participant, and the funding provided by WIOA available to the Adult, Dislocated Worker, or Youth Programs.

The cost for ITAs are determined by the average cost of training for specific in-demand occupations within the local area as well as the following criteria:

- Whether the training investment is in line with the future expected earnings of the participant;
- Whether the training is being provided as part of the registered apprenticeship program; and

- Consideration of the full cost of participating in training services, including costs for fees and books, tuition, and other associated costs.

An adult, dislocated worker, or out-of-school youth participant may select a training that costs more than the maximum amount available for ITAs when other sources of funds are available to supplement the ITA.

2. Allowable Individual Training Account Costs

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

- Tuition and fees
- Books
- Tools
- Uniforms
- Tests
- Medical immunizations/tests

Supportive Services are necessary to the success of the ITA (e.g. transportation or childcare) and shall be provided to the participant as needed and not included in the cost of the ITA.

ITA Authorization and Modifications

1. Individual Training Account Authorization

Service Providers shall use an ITA Authorization Form (Attachment I) to document eligibility. The form must be completed and uploaded into CalJOBS and noted within a case note on the program's monthly report prior to the start date of training.

2. Individual Training Account Voucher

The Service Providers shall generate and execute an ITA Voucher (Attachment II) and document into CalJOBS and case notes on the program's monthly report (whichever is most applicable) prior to the start date of the training. No ITA Voucher will be issued, approved, or paid retroactively for any participant previously enrolled in training by an I-TRAIN training provider, prior or concurrently to their enrollment into a WIOA/Non-WIOA program.

If a participant does not complete a training program listed on I-TRAIN, and within the next year, requests to re-enroll into the previous program or a new one, then the following conditions must be met in order to be approved for a new ITA:

- Participant has been determined eligible for training services by the Service Provider;
- Service Provider must request approval from the Orange County Director of Workforce Development. Request must be made in writing and should include supporting documentation.

It is the responsibility of the Service Providers to manage the documentation of authorization and obligation of allocated ITA funds in accordance to this policy.

3. Participant Training Agreement

The Service Provider is to collect a signed Participant Training Agreement (Attachment III) from each participant prior to starting the training program in order to document that the participant understands the expectations and requirements of the chosen training program. A copy must be maintained and uploaded to CalJOBS.

4. Waivers

Service Providers must request a waiver (Attachment IV) for the following situations prior to approving the ITA. All waivers must be submitted to the Orange County Director of Workforce Development for approval.

- An ITA for a training program not in an in-demand occupation or industry sector;
- An ITA cost greater than the pre-approved amount of \$6,500
- An ITA longer than 24 months.

Approval from the OC Director of Workforce Development for any of the above situations must be obtained prior to implementing an ITA. Waiver approvals must be uploaded into CalJOBS and documented in the participant's case notes.

5. ITA Payment

OCWDB WIOA ITA participants are to be considered private-pay students. Service Providers are to pay the training provider prior to or upon the participant's first day of the training program. Service Providers are required to maintain the training program billing statement/invoice with the participant's ITA Voucher and, once the Service Provider has paid for the program, the receipt or proof of payment provided by the training institution. Service Providers are responsible for validation and payment of all invoices and documentation of participants' performance outcomes.

6. ITA Modifications, Voids, and Discontinuation

An ITA may be modified to ensure that a participant attains their educational goals and subsequent employment. An ITA modification occurs when there is a change to the ITA that affects the training program, training dates, and/or cost. An ITA requiring a cost change must have prior approval from the Service Provider Program Manager documented on the ITA Authorization Form. Upon approval, an amended ITA Voucher is executed with the training provider. Any modification to an ITA shall be documented on the Training ITA Authorization Form, ITA Voucher, participant case notes, and activity status updated in CalJOBS, as applicable.

An ITA Void occurs when a participant decides to forego training, does not start training, and does not incur costs. An ITA Discontinuation occurs after the participant starts training and incurs a cost. The Service Provider is responsible for understanding a training provider's refund policy and determining when a refund is due for early termination of a participant's training. The Service Provider is to complete the ITA Void/Discontinuation Form (Attachment V) when a void or discontinuation occurs with a participant. Any voids or discontinuations to an ITA

shall be documented on the ITA Authorization Form, ITA Void/Discontinuation Form, participant case notes, and activity status updated in CalJOBS.

7. Recovery of Tuition Funds

In the event a participant discontinues training, the Service Provider must do due diligence to ensure the recovery of WIOA and non-WIOA funds provided to training institutions. Prior to placement in a training program, the Service Providers must verify the following:

- The refund policy of the training provider for early termination from the training program;
- A requirement for the training provider/participant to notify the case manager of early participant/student dropout;
- The amount and percentage of the advanced payment to be returned;
- Turnaround timeframe for the refund; and
- Time spent in training before a refund will no longer be honored.

If it is determined that a refund is due, the Service Provider/participant will initiate the refund process with the training provider. Once the Service Provider recovers tuition funding from a training provider for an ITA expense that had been previously reimbursed by the County, the Service Provider will submit a refund in the form of a check to the County and include back-up documentation with the following information:

- Participant's name;
- Name of training program; and
- Copy of previous invoice that the training program was paid.

Service Providers are obligated to return all tuition refunds during and after the contract term within 60 days of notification of participant dropout/termination date.

8. ITA Obligation, Expenditure and Leverage Reporting

Each Service Provider shall be issued an allocation of funds which shall be monitored and tracked to ensure that authorized and obligated cost of ITA's do not exceed the allocated total. After authorization, the total cost of the ITA, the leveraged amounts, and expenditures shall be reported in a format directed by the County of Orange.

Service Provider Reimbursement

Service Provider reimbursement of ITAs shall be submitted to the County of Orange on the corresponding monthly invoice in which the training program was paid. County of Orange approval of payments are contingent on verification of documentation of payment (i.e. itemized receipt, ITA Authorization, ITA Voucher) and will be subject to a review of eligibility based on documentation.

On a quarterly basis, Service Providers will reconcile, review, and report the results of ITA funding activities with Training Providers to the County of Orange.

Documentation

It is the responsibility of the Service Provider to track each participant monthly to ensure that the participant is receiving training throughout the duration of the course. For WIOA Service Providers that utilize CalJOBS, participant information must be scanned into CalJOBS. Documents scanned into the CalJOBS System take the place of hard files for verification, monitoring, and audit purposes per OCWDB CalJOBS Document Imaging and Scanning Policy. For non-WIOA programs, including but not limited to SSA programs, hard paper files and all other documentation should be maintained according to established policy. ITA eligibility, availability of other grant funding, and the other requirements of this policy must be documented.

The following items are examples of the supporting documentation for ITAs:

1. Assessment results supporting the selected program of study. The assessment must support the need for training including a determination by a case manager that the participant will be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone; and that the selected program of study will result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
2. Completed IEP/ISS documenting the selected program of study, anticipated and actual start/end dates, and training outcomes;
3. Verification of scholarships, FAFSA, Pell, or TAA application and award status, if applicable;
4. Authorization of the ITA (Attachment I) and any approved increase modification;
5. Case note documenting that the selected training provider is on the Eligible Training Provider List;
6. ITA Voucher (Attachment II);
7. Participant Training Agreement (Attachment III);
8. Approved waiver (Attachment IV), if applicable;
9. ITA Void/Discontinuation Form (Attachment V), if applicable;
10. Documentation of the participant's progress and/or grades;
11. Documentation of certificates and/or degrees; and/or
12. Enrollment and updating of activity codes.

For Non-WIOA Service Providers, payment reimbursement approvals are subject to the access and availability of training documentation as outlined above.

Outcomes

Service Providers shall provide individualized job placement assistance no later than when the client reaches 75% of training completion to ensure that the training leads to unsubsidized employment in a related field. Activities shall be entered and updated into the CalJOBS system and/or within participant case notes as documented within monthly program reports. Service Providers are to report any relevant information pertaining to the training program that could affect current and future outcomes (drop-outs, issues or discrepancies with the program, etc) to their OCWDB Grants Manager. OCWDB will relay the information to South Bay WIB.

Successful completion of training courses must lead to a recognized certificate/credential or equivalent, and attainment of unsubsidized employment.

Reporting Performance Outcomes

Enrollments, Cost Obligations, Expenditures, Refunds, Leverage, Completion Status, and Employment outcomes shall be tracked by the Service Provider and reported in a format outlined by the County of Orange.

ACTION

Bring this policy to the attention of all affected staff and all relevant parties.

INQUIRES

If you have any questions regarding this policy, please contact your Contract Administrator at (714) 480-6500.

ATTACHMENTS

Attachment I: Individual Training Account Authorization Form

Attachment II: Individual Training Account Voucher

Attachment III: Individual Training Account Participant Agreement

Attachment IV: Individual Training Account Waiver

Attachment V: Individual Training Account Void/Discontinuation Form

ATTACHMENT I
Individual Training Account Authorization

Participant Name			
WIOA Application Number			
Training Program			
Training Start Date		Training Completion Date	
ITA Justification Summary			
IEP and career assessment documents ITA eligibility	1. Without training, participant is unlikely to obtain or retain employment that leads to economic self-sufficiency or wages. Yes ☐ No ☐ 2. The participant's assessment determined the individual has the skills and qualifications to successfully participate in training? Yes ☐ No ☐ 3. The training will result in a credential/certificate that will lead to employment in a demand occupation? Yes ☐ No ☐ 4. The participant started/completed financial literacy training. Yes ☐ No ☐ Additional Notes:		
Participant Verification	1. The participant researched at least three appropriate training programs listed on I-TRAIN. Yes ☐ No ☐ 2. The participant conducted at least one site visit of the school. Yes ☐ No ☐ 3. If the participant chooses an online program, the participant has reliable access to a computer and/or necessary equipment. Yes ☐ No ☐ Additional Notes:		
Financial Assistance	The participant is authorized for the ITA utilizing the following funding: ☐ Federal or state, describe: ☐ Private scholarships, describe: ☐ WIOA ITA ☐ Other		
Waivers	Was a waiver obtained from the OC Director of Workforce Development for this ITA? Yes ☐ No ☐		
Modification, Void, or Discontinuation Notes			

Case Manager (Print)

Case Manager Signature_____
Date

Program Manager (Print)

Program Manager Signature_____
Date

Attachment II: **INDIVIDUAL TRAINING ACCOUNT (ITA) VOUCHER**

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

Participant Name		WIOA Application #	
Service Provider		Grant Code	
Billing Address		City, State, Zip Code	
Phone		Email	
Case Manager		Email	
I-TRAIN Provider		Code	
Contact / Title		Email	
Facility Address		City, State, Zip Code	
Phone		Email	
Training Program Name		ETPL Program Code / Course ID	
Start Date	Projected End Date	Total Hours	Occupational Code
Anticipated Placement Wage		Employer	
Comments / Benchmark Goals / Online requirements			
TRAINING COSTS			
a) Total Training Costs	\$		
a.1) Tuition/Fee	\$		
a.2) Books	\$		
a.3) Tools	\$		
a.4) Other Costs	\$		
a.5) Other Cost Explanation			
FINANCIAL AID / COST ASSISTANCE			
b) Financial Aid Applicable	☐ Yes ☐ No		
c) Financial Aid Type (use comments below to identify other types of financial aid)	☐ Pell Grant ☐ Stafford Student Loan ☐ School Academic Scholarship ☐ School Athletic Scholarship ☐ Other (i.e. school discounts/adjustments, personal loan, etc.)		
d) Total Financial Aid	\$		
e) Financial Aid Status	☐ Pending ☐ Awarded ☐ Void		
FINAL ITA OBLIGATION			
f) WIOA ITA Cost (a minus d)	\$		
g) Comments			

By signing and transmitting this ITA voucher, the undersigned certify that the information reflected herein are in accordance with all Federal, State, and local policies and as required by appropriate laws. Service Provider shall be responsible to pay Training Provider for costs identified above with the exception of any costs already paid for through Educational Assistance Grants and or loans. In the event the participant does not complete the enrolled course after payment, a refund will be owed to the Service Provider in accordance with Training Providers Refund Policy at the time of signing this voucher. Training provider agrees to provide progress reports and/or documentation of attendance and training completion, as requested by Service Provider.

Print Name of Participant

Participant Signature and Date

Print Name of Case Manager

Case Manager Signature and Date

Print Name of Program Manager

Program Manager Signature and Date

Print Name and Title of Training Provider

Training Provider Signature and Date



Attachment III
PARTICIPANT TRAINING AGREEMENT

Participant Name:

You have been approved for Workforce Innovation and Opportunity Act (WIOA) Title I funding to assist with costs associated with the following employment-related training:

School	
Training Program	
Anticipated training start date	
Anticipated completion date	
Anticipated wage after program completion	

I, (participant's name), agree with the following:

- I understand that continued WIOA tuition assistance is contingent on availability of WIOA funding and my satisfactory progress in school.
- I agree to seek employment upon completion of training and will notify my case manager immediately upon obtaining employment.
- I researched at least three training program options on I-TRAIN and completed at least one site visit. Name schools below.
 - 1.
 - 2.
 - 3.
- I completed labor market information and career planning research when selecting training program options.
- I have reviewed and will comply with the training institution's attendance, withdrawal, and code of conduct policies.
- If I am taking an online training course, I have reliable access to a computer and any necessary equipment to complete the training.
- To ensure there is no duplication of tuition payment, I will provide my case manager with application results, including award letters from other funding sources, including, but not limited to: FAFSA, CalWORKS/TANF, CalFRESH/SNAP, GI Bill or other Federal financial aid available to military veterans, TAA, State-funded grants, scholarships, or private job training programs.
- I authorize (school) to release my educational records, including attendance, grades, transcripts and/or progress reports, financial awards, educational expenses, etc. to my case manager.
- I will strive to maintain, at a minimum, satisfactory progress which includes:

- o A grade point average that does not fall below 2.0 for two consecutive terms;
or
 - o A grade point average sufficient to graduate from, or receive certification in my approved area of study; or
 - o Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.
 - o In the case of self-paced or ungraded learning programs, satisfactory progress means participating in classes and passing certification examinations within the timeframe established under the approved training plan.
- I will submit copies of grades/progress reports to my case manager at agreed upon timeframes but prior to the start of the next training session.
 - I will maintain ongoing contact with my case manager as documented on my Individual Employment Plan (IEP) but no less than once per month.
 - I will resolve issues with the training instructors and training institution directly. If I am unable to resolve them satisfactorily, I will contact my case manager for assistance.
 - I will notify my case manager immediately if issues or concerns arise that may impact my continued training participation or require a change to my training program/schedule.
 - I will notify my case manager immediately if I withdraw from the training program.
 - If I receive a refund check directly from the training institution, I will immediately return the check to my Service Provider/case manager.
 - I will notify my case manager immediately if my contact information changes.

I understand that failure to comply with the terms of this agreement may result in my termination from the WIOA program. I have read and agree to the conditions stated on this Participant Training Agreement. I received a copy of this agreement.

Participant Signature: _____ Date: _____

I have reviewed this Participant Training Agreement with the participant and witnessed his/her signature:

Case Manager Signature: _____ Date: _____



Attachment IV
Individual Training Account Waiver Request

Under Orange County Workforce Development Board's Individual Training Account Policy, a Service Provider may request a waiver on behalf of a WIOA participant for the following situations prior to finalizing an ITA:

1. An ITA for a training program not in an in-demand occupation or industry sector
2. An ITA cost greater than \$6,500
3. An ITA longer than 24 months

Participant Name: _____

Training Program: _____

Training Dates: _____

This waiver request is being submitted for the following reason:

- ☐ Training program not in an in-demand occupation or industry sector
- ☐ Training program costs more than \$6,500
- ☐ Training is longer than 24 months

Justification for waiver: _____

The additional documentation is required to be included with this waiver request:

1. ITA Authorization Form
2. ITA Training Account Voucher
3. Training Program Information (brochure, flyer, I-TRAIN print-outs), as applicable

Case Manager (Print)

Case Manager Signature

Date

Program Manager (Print)

Program Manager Signature

Date

County of Orange Use Only

OC Director of Workforce Development Approval: ☐ Yes ☐ No

Signature: _____ Date: _____

