



WIOA Title I Program Policies

Individual Training Account (ITA) Policy

POLICY #:	<i>P-1002, Rev. 5</i>
EFFECTIVE:	<i>December 12, 2023</i>
SUPERSEDES:	<i>Individual Training Account (ITA) and Contracted Training Policy, #P-1002, Rev. 4 released December 22, 2021</i>

PURPOSE:

This policy communicates WorkForce Central's eligibility and documentation requirements for WIOA Title I funded training paid through Individual Training Accounts (ITAs) and describes circumstances when WorkForce Central may contract directly for training services in lieu of an ITA.

This policy is revised to:

- Clarify requirements for obtaining exemptions to this policy.
- Update circumstances when ITAs are not authorized.
- Remove ETO documentation requirements which are included in WorkForce Central's ETO Data Validation & Documentation Policy on WorkForce Central's [Policy Library](#).
- Other formatting and non-substantive editing for clarity purposes.

BACKGROUND:

The provision of WIOA Title I funded training through Individual Training Accounts (ITAs) is defined in [20 CFR Subpart C - Individual Training Accounts](#).

Individuals enrolled in WIAO Title I Adult and Dislocated Worker programs, and out-of-school youth ages 16-24 who are enrolled in the WIOA Title I Youth (Young Adult) program may be eligible for WIOA Title I funded training paid via an ITA. An ITA is an agreement established on behalf of the WIOA Title I recipient and the training provider.

ITA payments may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments also may be made incrementally, for example, through payment of a portion of the costs at different points in the training course.

Under limited conditions, as provided in 680.320 of WIOA sec. 134(d)(3)(G), WorkForce Central may contract directly with a training provider for a cohort of students rather than the individual student using an ITA. See [Contracted Training in Lieu of ITAs](#) for further information.

POLICY:

WIOA Title I service providers must comply with the terms of this policy and with the ITA documentation requirements prescribed in WorkForce Central's ETO Data Validation and Documentation Policy located on WorkForce Central's [Policy Library](#). Exceptions to this policy must first be approved by WorkForce Central in writing and documented in case notes recorded in ETO.

ITA Eligibility

- A. Individual Eligibility:** Individuals enrolled in WIOA Title I Adult and Dislocated Worker programs, and out-of-school youth ages 16-24 who are enrolled in the WIOA Title I Youth (Young Adult) programs may be eligible for WIOA Title I funded training through and ITA when the following criteria are met:
- An individual's assessment results indicate they:
 - i. Are unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone.
 - ii. Are in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment, and
 - iii. Have the skills and qualifications to participate successfully in training services.
 - An Individual Employment Plan (IEP) or Individual Service Strategy (ISS) is created in collaboration with the WIOA Title I service provider that identifies the selected training program. The selected training program must align with the individual's documented career goals. The IEP or ISS must include the anticipated and actual start dates of training, training completion date, and credential earned.
 - The individual is determined ineligible for, or there is an absence of, grant assistance from other sources such as Pell grants to pay the costs of training or is determined to be in need of additional assistance beyond available grant resources in order to complete their training goals.
 - The selected training programs are:
 - i. Included on the [Eligible Training provider List \(ETPL\)](#), and
 - ii. Directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the local area

or in the planning region or in another area in which the participant is willing to travel or relocate, and

- The individual maintains satisfactory progress/grades throughout the training program.

Documentation for the above criteria must be uploaded into the applicable training service recorded in the WIOA Title I recipient's ETO record in accordance with WorkForce Central's ETO Data Validation and Documentation Policy located on WorkForce Central's [Policy Library](#).

B. Trainer/Training Program Eligibility: Trainers and training programs must meet specific eligibility criteria to receive WIOA Title I and other federal and state dollars. Qualified trainers/training programs are posted on Washington State's [Eligible Training Provider List \(ETPL\)](#). In addition, [ESD's Policy 5611, Revision 2 – Governor's Procedure for Determining Training Program Eligibility](#) and accompanying [Workforce Innovation and Opportunity Act Title I-B and Washington's Eligible Training Provider List Evaluation Procedures](#) set forth Washington State's policy and procedures for determining the eligibility of training providers and their programs to receive WIOA Title I funded ITAs. WorkForce Central's role in determining training provider inclusion on the ETPL for local training providers who do not qualify for initial eligibility to the ETPL is detailed in WorkForce Central's Determining Training Provider Eligibility for the Eligible Training Provider List (ETPL) policy posted on WorkForce Central's [Policy Library](#).

Qualified WIOA Title I recipients must select a training provider or training program from the State's [ETPL](#). See [Consumer Choice](#) below for details.

ITA Required Outcomes

WIOA Title I ITAs pay for training programs that are defined as one or more courses or classes, or a structured regiment, that lead to:

- An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state involved or the federal government,
- An associate or baccalaureate degree,
- A secondary school diploma or its equivalent,
- Employment, or
- Measurable skill gains toward a credential.

Courses of study that do not lead to any of the above outcomes are not appropriate for WIOA Title I funded ITAs.

Allowable ITA Expenses

ITA funding can only include the cost of training services such as, but not limited to:

- Instructor salaries and benefits
- Classroom space
- Instructional materials
- Tuition
- Books
- Academic fees
- School supplies
- Computer and lab fees
- Educational testing and certification
- Equipment and tools
- Prerequisite training to a vocation training program if the prerequisite training is required by the educational institution
- Other required items or services that are listed on a school syllabus or other official school documentation

Unauthorized ITA Expenses

ITAs are not authorized for the following:

- Skill-building services that do not rise to the level of occupational skills training, including individualized services such as workforce preparation activities or short-term prevocational service.
 - Individualized services may include literacy, internships, work experiences, and other activities that are intended to prepare individuals for work but do not provide formal occupational skills training and do not lead to a credential.
 - Short-term prevocational training may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct, or other non-occupational specific topics that are intended to prepare individuals for unsubsidized employment or training.
- Full bachelor's degree programs. WIOA Title I funded ITAs may pay for a portion of an individual's bachelor's degree program but may not fund the full cost of a bachelor's degree program.
- Master/graduate degree programs. WIOA Title I funded ITAs are not authorized for admission to or attendance in a master or graduation degree program.
- Training programs that do not lead to:

- Industry recognized certificates or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state involved or the federal government, an associate or baccalaureate degree,
 - A secondary school diploma or its equivalent,
 - Employment, or
 - Measurable skill gains toward a credential.
- More than one training program, if the completion of one training program qualifies the individual for employment and meets their self-sufficiency needs.
- Training programs unrelated to the individual's career goals identified in the comprehensive assessment/objective assessment and individual employment plan or individual service strategy.

Coordination with Other Federal Financial Assistance

WIOA Title I funds are intended to provide training services in instances when there is no federal grant assistance (or insufficient assistance) from other sources such as Federal Application for Federal Student Aid (FAFSA, Pell Grant), Temporary Assistance for Needy Families (TANF), Basic Food Employment and Training (BFET), Title IV programs, and state-funded grants to pay for the training costs. WIOA Title I service providers must coordinate to the extent possible with other sources of federal and state training grants such as these, excluding loans, to pay for training costs so that WIOA Title I funds are used to supplement and not supplant other sources.

WIOA Title I service providers may consider the full cost of participating in training services including the cost of support services and other appropriate expenses.

Excluded from “other financial assistance”:

- The use of WIOA Title I funds to pay down a loan of an otherwise eligible individual is prohibited, however, the mere existence of a federal loan, regardless of the status, must not impact WIOA Title I training eligibility determinations.
- As stated in [WIOA Final Rules](#), page 56121 and [TEGL 19-16](#), Department of Veteran Affairs education and training benefit services are not included in the category of “other resources of training grants” listed in [680.230\(b\)](#). Therefore, veterans and eligible spouses are not required to first use any available benefit entitlements associated with their military service before being considered eligible for WIOA Title I funded training, and service providers are not required to consider the availability of those funds.

A qualified individual may enroll into a WIOA Title I funded training program while their application for a Pell Grant is pending if the service provider made arrangements with both the training provider and the student regarding allocation of the Pell Grant, if it is subsequently

awarded. In this situation, the training provider must reimburse the WIOA Title I service provider the WIOAT Title I funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charged to attend training. Reimbursement is not required for the portion of the Pell Grant assistance disbursed directly to the student for education-related expenses.

WIOA Title I service providers must document the availability or absence of other federal grant resources, excluding loans and Department of Veterans Affairs training benefits, to pay for training costs in case notes recorded in the applicable training service touchpoint in ETO.

ITA Authorization

ITA authorization is contingent on the following:

- **In-demand occupation:** The selected training program must align with in-demand industry sectors or occupations in the Pierce County area, or in another area to which the individual is willing to commute or relocate, or for occupations determined by WorkForce Central to be in economic sectors that have potential for sustained demand or growth in the local area. Evidence of the alignment with in-demand occupation/high potential for sustained demand or growth must be uploaded in the applicable training service touchpoint recorded in ETO.

Registered apprenticeship programs are considered “in-demand” even if the labor market information may not list the occupation as “in-demand” because registered apprenticeship programs, being tied to a specific employer, only enroll individuals when there is employer demand, which makes it possible to carry out the on-the-job aspect of the instruction. ITAs may be used to pay the educational portion (i.e., related instruction component) of the registered apprenticeship.

- **Consumer Choice; Eligible Training Provider List (ETPL):** Training services, whether under ITAs or under contract, must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider. Each Local Workforce Development Board (WDB), through the one-stop center, must make available to customers the state list of eligible training providers required in WIOA sec. 122(d). The list includes a description of the programs through which the providers may offer the training services, and the performance and cost information about those providers described in WIOA sec. 122(d).

WIOA Title I funded training programs must be selected from the Eligible Training Provider List (ETPL), as required in WIOA sec. 134(c)(F)(iii). Priority consideration must be

given to programs that lead to a recognized post-secondary credential and are aligned with in-demand industry sectors or occupations in the area.

Evidence of the training provider's listing on the ETPL must be uploaded in the applicable training service touchpoint recorded in ETO.

Eligible Training Providers Outside of Pierce County: An eligible WIOA Title I recipient may choose training providers and training programs outside of Pierce County if the selected training provider or program is listed on Washington state's, or another state's ETPL. When selecting an out-of-state training provider or program, there must be a reciprocity agreement between Washington and the other state regarding eligible training provider eligibility. Washington State has [reciprocity agreements](#) with the following states:

- Idaho
- Illinois
- Missouri
- Montana
- Oregon
- Utah

ITA Funding Limit

WorkForce Central does not limit the funding amount of WIOA Title I ITAs. WIOA Title I service providers have discretion to award ITAs in accordance with their internal policies, budget limitations, and this policy. Service providers must ensure equitable treatment in the provision of ITAs.

Continued ITA Funding, Satisfactory Progress Requirement

Continued ITA Funding is contingent on the availability of WIOA Title I funds and the student making satisfactory progress in school, except for good cause, as explained [below](#). Service providers must review the student's training progress and expenses quarterly or more frequently depending on the training institution's schedule. A student's training progress will be considered satisfactory upon earning:

- A grade point average that does not fall below 2.0 for two consecutive terms, or
- A grade point average sufficient to graduate from, or receive certification in the student's approved area of study, or
- Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training program.

- 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 program.
- Washington State has established a grade of “C” or higher as having met the academic standard.

Good Cause: Good cause for failure to make satisfactory progress in training includes specific factors that would cause a reasonably prudent person in similar circumstances to fail to make satisfactory progress. Good cause includes, but is not limited to:

- Illness, injury, or disability of the student or a member of the student’s immediate family.
- Severe weather conditions or natural disaster precluding safe travel.
- Destruction of the student’s records due to a natural disaster or other catastrophe not caused by the student.
- Acting on advice received from an authority such as the training provider, instructor, or career advisor.
- Training is delayed or cancelled.
- Accepting stop-gap employment with hours or other work conditions that conflict with the training.
- Accepting goal-related employment prior to completion of training.

WIOA Title I service providers must document student’s progress on the ISS or IEP uploaded in ETO or recorded in case notes in ETO. Service providers must also upload and document in case notes applicable measurable skill gains (MSG) and outcomes of training, including credential earned and all other ETO documentation requirements prescribed in WorkForce Central’s ETO Data Validation and Documentation Policy on WorkForce Central’s [Policy Library](#).

ITA Modifications

An ITA may be modified to ensure the student attains their educational goals and subsequent employment. In some circumstances, such as when a training program is removed from the ETPL, or when extraordinary program expenses develop, the student and service provider must agree on whether to complete training with the existing training provider, seek a similar training elsewhere, or discontinue training.

When a training program is removed from the ETPL, students may complete their training in that program. However, an ITA should not be modified or extended for a training program that is no longer on the ETPL.

Service providers must use discretion in determining the number of authorized ITA modifications. ITA modifications must be documented in case notes recorded in the applicable training service touchpoint recorded in ETO.

ITA Obligations

Purchase orders may be written to obligate ITA funds. The obligation documents an agreement between the ITA recipient, the WIOA Title I services provider, and the training provider. De-obligates must be tracked if students receive additional resources and/or discontinue training prior to completion.

Recovery of Tuition Funds

In the event a student discontinues training, the service provider must document attempts to recover the WIOA Title I training funds provided to the training provider. Service providers must document the following:

- The training provider's refund policy for early withdrawal from training, including when a refund will no longer be honored.
- A request of the training provider to notify the service provider if the student discontinues training.
- The percentage of the advance payment to be returned.
- Turnaround timeframe for the refund.

Efforts and outcomes to recover WIOA Title I training funds must be documented in case notes recorded in the applicable training service touchpoint in ETO.

ITA Documentation Requirements

WIOA Title I serviced providers must document and record the provision of an ITA or contracted training in accordance with this policy and procedures outlined in WorkForce Central's ETO Data Validation & Documentation Policy located on WorkForce Central's [Policy Library](#).

Contracted Training in Lieu of ITAs

As provided in 680.320 and WIOA sec. 134(d)(3)(G), WorkForce Central may contract directly with a training provider, rather than ITAs funded through the WIOA Title I service provider. Contracts may be used in the following circumstances and the [consumer choice requirements](#) of 680.340 must be met:

- On-the-job training (OJT)
- Customize training

- Incumbent worker training (IWT; WorkForce Central’s Employer Reskill/Upskill Fund)
- Transitional Jobs
- When WorkForce Central determines there is an insufficient number of eligible training providers in the local area for ITAs. The determination process must include a public comment period for interested training providers of at least 30 days and be described in the Local Plan. The Local Plan must describe the process used in selecting the training providers under a contract for service.
- When WorkForce Central determines there is a training program of demonstrated effectiveness offered in the area by a community based or private organization who serves underrepresented populations including individuals experiencing systemic [barriers to employment](#). WorkForce Central must develop criteria for determining demonstrated effectiveness of the training program, particularly as it applies to the individuals to be served. The criteria may include:
 - The organization’s financial stability.
 - Demonstrated performance in the delivery of services to individuals experiencing systemic barriers to employment through such means as program completion rate, attainment of the skills, certificates, or degrees the program is designed to provide, placement after training into unsubsidized employment, and employment retention.
 - How the specific program relates to the workforce investment needs identified in the Local Plan.
- When WorkForce Central determines it would be most appropriate to contract with an institution of higher education [see WIOA sec. 3(28)] or other training provider to facilitate training of multiple students in in-demand industry sectors or occupations, provided the contract does not limit consumer choice.

WorkForce Central may directly provide training services in limited circumstances and when authorized by the Governor.

REFERENCES:

- WIOA sec. 129(c)(2)(D) and sec. 134(c)(G)
- 20 CFR 680.230; .300; .310(d); .320; and .330
- 20 CFR 681.550
- TEN 19-22 – Reporting Training in the U.S. DOL’s Participant Individual Record Layout (PIRL)
- WAC Chapter 192-270
- ESD WIOA Policy 5601, Rev. 2
- ESD WIOA Policy 5611, Rev. 2



- [Directive of the Governor 21-24 – Designation of additional WIOA focus populations](#)

APPROVED


[Katie Condit \(Dec 12, 2023 13:35 PST\)](#)

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Dec 12, 2023

Date

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