Policy: **Use of Individual Training Accounts (ITAs) in Area 13**

Reference: **WIOAPL 15-11.3, Published 09.27.2021**

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Purpose

The purpose of this local Individual Training Account (ITA) Policy is to identify Area 13's parameters for allocating federal training funds for in-demand occupations that lead to unsubsidized employment, self-sufficiency, and/or a self-sufficient career path.

Background

The Workforce Innovation and Opportunity Act (WIOA) Section 134(3) (G), of the WIOA law states that Individual Training Accounts (ITAs) will be disseminated through the One-Stop delivery system (referred to as OhioMeansJobs centers in the state of Ohio). ITAs will be issued for occupations that are in-demand in the local area or where the participant is willing to relocate to (as approved by the local workforce board). Ohio Administrative Code 5101:9-2-03 & 5101:9-3-05 sets forth complaint procedures.

Local Policy

In Area 13 funds for training will be distributed through the ITA process and will depend on the availability of funds and the suitability of the individual for formal training. The need for training will be evaluated against the customer's need to reach a level of self-sufficiency, their current level of training, and the appropriateness of training to current needs of the workplace.

Training is defined as one or more courses or classes, or a structured regimen that, upon completion, leads to:

- An industry-recognized certificate or credential, associate degree, baccalaureate degree, or
- The skills or competencies needed for a specific job or jobs, an occupational group, or generally, for many types of jobs or occupations, as recognized by employers and determined prior to training.

Suitability for ITAs

Area 13's Workforce Development Board, known as the Workforce Council of Southwest Ohio (WCSO), will also ensure that WIOA programs in the local area allows customers access to training opportunities to advance themselves and ensure that employers have a well-trained workforce. However, customers must meet the following minimum criteria to receive training services:

- Be unlikely to obtain or retain self-sufficient employment or higher wages from previous employment via Career Services
- Need training to obtain or retain self-sufficient employment or higher wages from previous employment
- Have the skills and qualifications to participate in training
- Select training that is directly linked to employment opportunities
- Be unable to obtain other grant assistance or require assistance in addition to other grants
- Be likely to be successful in the training and career

A high school diploma or High School Equivalency (HSE) is an essential foundation to the individual's future in the workforce. Individuals not having a diploma or HSE will be referred to a local HSE program, such as Aspire, to receive assistance in preparing for their HSE test. Adult Basic and Literacy Education provides basic skills and English-as-a-second language on a referral basis, usually at no cost. If there is a cost, Adult Basic and Literacy Education and English-as-a-second language will be provided as a service either through commercially off-the shelf, sole-source procurement with public education providers, or through competitive contracts.

Potential participants must also be suitable for training services. As deemed appropriate by the Area 13 WIOA staff, individuals seeking training services may be required to complete an academic assessment to confirm the possession of the "skills and qualifications to successfully participate in the selected program of training services" (WIOA pgs. 105-106, sec.134).

Assessment of suitability should also include interviews, inventory of skills and interests (through inventory or interview), career information, and any appropriate labor market information.

Applicants with an associate's degree or higher may be considered employable and capable of achieving self-sufficiency, depending upon the area of study and work experience.

The following exceptions may apply:

- Documented disability that prohibits or severely limits the applicant from returning to previous occupation.
- Conditions related to age that severely limit the applicant from returning to previous occupation.
- The existing degree or certification is attained outside the State of Ohio and does not transfer all credits and/or occupational credentials (proof required).
- The degree is no longer in demand or is considered outdated by the industry standards. Applicants must provide supporting documentation, such as a job search log demonstrating inability to obtain employment.

Establishment of In-Demand Industry Sectors

Biennially, the WCSO will review the list of in-demand sectors and select the sectors most relevant to the needs of the local area. These must also be listed on the Ohio in-demand list of occupations. Occupational training must be included on either the local or the state list of in-demand occupations.

Use of Sector Strategies

Requests for training should indicate areas that show real growth in the local economy or should be occupational areas that will help to enhance economic growth. Ohio Department of Job and Family Services (OJDFS) requires that least 85% of the ITA enrollments must be in an in-demand occupation as defined by and published by the State of Ohio. Area 13 requirements:

a) 85% of the ITAs be in one of the Area 13 in-demand industry sectors as well as the State defined in-demand industry sectors, or
b) The training must be on the State in-demand list and be tied to a company or industry identified by a local Economic Development official as a growth field within the area. Those ITAs falling into the category “b” will need to have a bona-fide, verifiable pre-hire letter from a company or industry that requires individuals to have skills relating to the identified training field.

The remaining 15% of ITAs may include occupations in a geographic area in which the participant is willing to work or relocate or a written and verifiable guarantee of a bona fide job upon completion of training. It is the responsibility of Area 13 WIOA staff to remain within the 85/15 percentage guidelines to assure that Area 13 is compliant with state and federal guidelines. Appropriate documentation, including a list of the ODJFS in-demand occupations showing the appropriate occupation and time frame, must be maintained in the case file to be reviewed during comprehensive monitoring.

Waivers may be requested to exceed the State's 15% enrollment requirement. It is understood that waivers will be approved on a case-by-case basis, with appropriate documentation. WCSO staff will send such waiver requests via email to WIOAQNA@jfs.ohio.gov, with the subject line "ITA Waiver Request."

Approved Training Programs

Training programs approved for Area 13 must be on Area 13's Eligible Training Provider List. Exceptions may be made at the discretion of the Workforce Council of Southwest Ohio to meet the emerging needs of the local community, industries, or workforce. It is the intent of WCSO to ensure WIOA customers are fully informed regarding training options, not to restrict customer choice.

In addition, WCSO will permit the use of virtual training opportunities on a case-by-case basis, with a preference for training providers that provide a physical location for individuals to meet with training provider staff that is within the Greater Cincinnati Metropolitan Statistical Area.

Allowable Costs and Fees

The maximum amount for an ITA requiring 7 months or more time to complete may not exceed $15,000 of WIOA funds for program costs. Any program for 6 months or less cannot exceed $8,000. Costs must be reasonable and necessary to meet the needs of the industry. The funding cap will be reviewed by the WCSO Eligible Training Provider Committee at a minimum of once a year.

The amount for an ITA shall include costs required by the training institution to complete the training. That may include, but is not limited to the following:

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

ITA costs do not include supportive services.

It is the intent of the federal WIOA program that WIOA funds are the funds of last resort. A comprehensive assessment, a budget, and determination of access to other grants or funding (including Pell, TAA and scholarships) must be conducted before WIOA funds are allocated. Any grants received, such as Pell, shall be applied toward tuition cost

prior to issuing an ITA. The graduation rates, placement rates, and wage rates of the graduates from the training provider need to be carefully considered.

The duration of an ITA will be determined by the course of study chosen; however, it must fall within the guidelines indicated below. The training plan must be realistic and attainable.

The maximum duration of any ITA may not exceed a 24 (twenty-four) month period. Exceptions may be granted in instances where, through no fault of the student, the student is unable to complete the training as planned. Exceptions may include:

- Lack of availability of classes
- Cancellation of classes
- Unforeseen illness (of the participant or an immediate family member of the participant)
- Fulfillment of governmental obligations, such as jury duty, military service or leave time

Self-Sufficiency and Family Self-Sufficiency

WCSO establishes, in accordance with the five-year regional plan, a definition of self-sufficiency as a goal for adults to reach when seeking WIOA services. Self-sufficiency is viewed as a family's gross wage in excess of 200% of the poverty level for adults, or for a dislocated worker, at least 90% of one's previous salary (also to be seen as the Area 13 definition of Family Self-Sufficiency) The goal of self-sufficiency is meant to ensure that all low-income customers will have access to employment and training resources.

WCSO establishes that the expenditure of WIOA funds is subject to the availability of WIOA and/or TANF dollars as appropriated by the state to the local area.

On-the-Job and Customized Training

On-the-job and customized training will not be subject to procurement as these exceptions to the ITA system are developed on a one-to-one basis for employers with whom there is a specific customer who meets a match in interests and aptitudes for the job vacancy available.