



# Individual Training Accounts

Department: Office of Economic & Workforce Development

Effective Date: July 1, 2023

Directive # WDD 23-15

Supersedes: WIA104-A.1

## **PURPOSE**

This directive provides guidance regarding the policy and procedures for the use of Individual Training Accounts (ITAs).

## **REFERENCES**

- [WIOA Section 129\(c\)\(2\)\(D\), Section 134\(c\)\(G\)](#)
- [20 CFR 680.230, 680.300 - 680.350](#) and [681.550](#)
- [EDD WSD21-03 WIOA Eligible Training Provider List – Policy and Procedures](#)
- [EDD WSD19-04 Veteran Priority of Service](#)
- [City and County of San Francisco \(CCSF\), Office of the Controller Accounting Policies and Procedures](#)
- [Jobs for Veterans Act, Pub. L. 107-288](#)
- [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 \(January 2, 2020\)](#)
- [EDD Workforce Services Directive No. WSD19-10, Directive on the Recovery of WIOA Tuition and Training Refunds \(February 20, 2020\)](#)
- OEWD Forms: <https://sf.gov/resource/2022/wioa-procedures-and-forms>

## **BACKGROUND:**

WIOA Section 134(d)(3)(G) identifies in general, training services shall be provided through Individual Training Accounts for eligible individuals through the America's Job Center of California (AJCC) delivery system. Training services provided through ITAs shall be directly linked to occupations that are in demand in the local area, the planning region or other area to which the participant is willing to locate. OEWD may also approve training services for occupations determined to be in sectors of the economy that have high potential for sustained demand or growth in the local area.

ITA funding in San Francisco is meant to complement OEWD's investment in Sector Academies (SAs) by providing additional options for:

1. Individuals who wish to pursue training for employment in San Francisco's priority sectors but for whom SA offerings are not a fit (e.g., occupation, eligibility, program schedule).
2. For individuals who wish to pursue training that will prepare them for entry into high growth occupations outside of the industry sectors supported by the SAs.

Training services provided under this section of WIOA shall be provided in a manner that maximizes informed consumer choice in the selection of an eligible provider. Service providers shall make available the [State list of eligible providers of training services](#) (ETPL) with a description of the programs through which the providers may offer the training services and the performance information and performance cost information relating to eligible providers of training services.

In addition to ITAs funded by WIOA Adult and Dislocated Worker grant funding (WIOA ITAs), Non-WIOA funding may be available to support ITAs.

## **POLICY**

For WIOA ITAs, only vendors listed on the State of California Eligible Training Providers List (ETPL) can be considered. Job Center case managers or employment counselors should familiarize themselves with the most recent ETPL issued by the State of California Employment Development Department (EDD). Customers must be advised by their case manager or employment counselor that their choice of training provider must come from this list.

The ITA request authorized by a case manager or employment counselor will be denied if participants or training programs do not meet the criteria laid out in the next sections. The OEWD service providers will not pay the invoices submitted by that training vendor and the customer will be liable for those charges if the ITA request is with a training vendor not on the ETPL list.

Non-WIOA ITAs may use vendors outside of the ETPL, but only if the vendor meets all the other vendor requirements detailed below, under Eligible Training Programs.

### **Participant ITA Eligibility**

Training services may be made available to unemployed and under-employed adults and dislocated workers who have met the eligibility requirements for an OEWD workforce-funded program:

1. After assessment, have been determined by the Job Center system to be in need of training services and to have the skills and qualifications to successfully complete the selected training program;
2. After assessment, have been determined to logistically have the supportive services in place to successfully complete the training (housing, income, access to transportation and/or technology);
3. Select a program of training services that is directly linked to the employment opportunities either in the local area or in another area to which the individual is willing to relocate;
4. If pursuing training in an industry sector supported by a Sector Academy (SA), have been determined to not be a fit for the SA offerings due to the kinds of occupations supported, the schedule of the trainings, or the entry requirements of the training; and
5. Are unable to obtain grant assistance from other sources to pay the costs of such training, including Federal Pell Grants established under Title IV of the Higher Education Act of 1965, or requires assistance in addition to other sources of grant assistance, including Federal Pell Grants (provisions relating to fund coordination are found at Sec. 663.320).

The [WIOA Adult and Veteran Priority of Service Directive \(23-24\)](#) must be followed in determining which customers receive training services.

### **Eligible Training Programs**

Occupational classroom training will be provided through training vendors that are evaluated, approved and placed on the state [Eligible Training Provider List](#).

- In no event shall an ITA carry a time or dollar balance after the program of training is either completed or terminated.
- The maximum length of training under a single ITA shall be two years.
- More than one ITA may be issued to a customer within a two-year period provided the total cost of the ITA does not exceed \$6,000.
- An ITA shall cover the cost of training, including tuition and other training-related items supplied by the training provider (e.g., books, license fees, training materials, registration fees, supplies, uniforms, DMV printouts, physical examinations, immunizations, health fees and insurance) but will not include or consider the costs of supportive services.

Eligible training programs will lead to a certificate or credential that meet the requirements for Credential Attainment under WIOA ([TEGL 10-16, Change 1](#)) laid out in [OEWD Credential Attainment & Measurable Skills Gain Procedure \(WDD 20-41\)](#).

Non-WIOA ITAs may be used to fund training with vendors not on the ETPL provided they meet all the above criteria, including the requirement to lead to certificates or credentials that meet the WIOA requirements for Credential Attainment.

Exceptions to this policy, on a case-by-case basis, can be made by the Director of OEWD, should individual circumstances warrant exception.

### **Recovery of Tuition Funds**

In the event a participant discontinues training, the case manager must do due diligence to ensure the recovery of OEWD funds provided to training institutions.

Prior to approving an ITA request, case managers must verify the following:

- The refund policy of the training provider for early termination from the training program;
- 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 immediately notify the subrecipient if a WIOA participant drops out of a training program during the time period when tuition can be refunded.

## **PROCEDURES**

### **I. Application**

Case Manager will follow steps outlined in ITA Staff Checklist.

Customers will have the responsibility of completing their requirements, as outlined in ITA Customer Checklist, in collaboration with their Case Manager not less than three weeks prior to the first day of the start of classes. With this schedule, the student can register for classes two weeks before the first day of classes. The participant's case file will be checked in the following sections for accuracy:

#### **Individual Employment Plan**

- Is current activity recorded? *check both goals, action plan and financial plan*
- Are appropriate barriers checked? *i.e., if payment is requested for transportation, is transportation checked as a barrier; is payment in accordance with supportive services policy?*
- Is the financial mix of services recorded? *Check both IEP and case note section.*

#### **Case Notes**

- Should reflect conversations and research pertaining to the participant's eligibility, including assessments that identify participant needs and/or progress
- Should reflect monthly contact
- Should contain information on payment

### **II. Rights and Responsibilities**

The [Participant Rights and Responsibilities form](#) is the listing of the rights and responsibilities of the student, case manager and Office of Economic and Workforce Development (OEWD). These rights and responsibilities will be given to the student as soon as they are identified as potential candidates for training.

One of the most important responsibilities of the student is to apply for financial aid as soon as possible. WIOA funding for training is limited to participants who are unable to obtain any or sufficient grant assistance from other sources to help for the costs of their training, including Pell Grants.

### **III. Approval**

OEWD staff will review the ITA Voucher to confirm the following:

- The participant is eligible for an ITA as demonstrated by meeting the criteria for eligibility detailed under "Participant ITA Eligibility."
- The training is eligible for ITA funding based on the criteria detailed under "Eligible Training Programs."
- Total Cost does not exceed \$6,000.
- Signed by all parties.

OEWD will approve payment for tuition and ancillary training costs only for those training vendors who meet the criteria detailed under “Eligible Training Programs” and only for customers who meet criteria detailed under “Participant ITA Eligibility.”

If further information is needed after the application has been submitted, OEWD will notify Job Center management.

#### **IV. Training**

While a student is attending classes, the case management staff and the student will maintain monthly contact. The case management staff will establish minimum standards and goals for each student for continuing OEWD supported training. These standards and goals may include minimum GPA, attendance records, area of training, degree sought and school of record. These standards will be part of the student’s IEP.

#### **V. Increase Adjustments**

If any line item of the student’s ITA Voucher needs to be increased, the student along with the case management staff must apply for the increase by voucher modification to OEWD for approval. All procedures remain the same.

#### **VI. Close outs**

When a student completes training and the related bills have been paid, accounts will be zeroed out by case management staff and the remaining balance will be returned to the case management staff’s site quarterly allocation. Student outcomes should be recorded in Workforce Central. Follow up services to procure work in the occupation the customer was training for should continue for 12 months.

#### **ACTION**

San Francisco Job Center and case management staff overseeing the award of ITAs must ensure that the policies and procedures described herein are followed and that this Directive is appropriately maintained until further notice.

#### **INQUIRIES**

Inquiries should be addressed to Director of Workforce Strategy at (415) 701-4848 or email at [workforce.development@sfgov.org](mailto:workforce.development@sfgov.org).

#### **Attachments:**

1. ITA Interest Form
2. ITA Staff Checklist
3. ITA Customer Checklist
4. ITA Voucher
5. Participant Rights and Responsibilities Form

*OEWD and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.*