3.4.1 ADULT AND DISLOCATED WORKER TRAINING SERVICES

All training services must be provided in accordance with Section 3.4. In order to better provide uniformity across all LWDAs, SWDB has approved specific policies for the creation of Individual Training Accounts, On-the-Job Training, Customized Training, Incumbent Worker Training, Work Experience, Transitional Jobs, and Apprenticeships.

3.4.1.1 INDIVIDUAL TRAINING ACCOUNTS (ITA)

I. Description

Individual Training Accounts (ITAs) are established on behalf of the participant. WIOA Title IB Adult, Dislocated Worker and youth participants will use ITAs to purchase training services from eligible providers in consultation with the case manager, counselor or coordinator.

ITAs may be made available to employed and unemployed adults and dislocated workers who have met the eligibility requirements for Intensive services, and have been determined to be unable to obtain or retain employment leading to self-sufficiency through such services.

The participant must have a completed IEP that indicates, through interview, evaluation or assessment, the participant's employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals have been identified.

Selection of a training program must include the identification that the training is directly linked to occupations that are in demand in the LWDA, or in another area to which an adult or dislocated worker is willing to relocate. In determining local demand occupation(s), LWDAs may allow for training in occupations that may have high potential for sustained demand or growth in the LWDA.

II. Limitations:

ITAs are limited to participants who (20 CFR § 680.230):

- A. Are unable to obtain grant assistance from other sources (including Federal Pell and other federal grants) to pay the cost of their training; or
- B. Require assistance beyond that available under grant assistance from other sources (including federal Pell, GI Bill and other federal grants) to pay the cost of their training. In making this determination, LWDA staff may take into account the full cost of participating in training services, including the cost of support services and other appropriate costs.
- C. Service providers and training providers must coordinate funds available and make funding arrangements with partner agencies and other entities so that WIOA ITA funds supplement Pell and other grant sources to pay for the cost of training (see D. re: Cost of Attendance).
- D. Participants may enroll in ITA funded training while their application for a Pell Grant is pending provided that the service provider has made arrangements with the training provider and the participant regarding the allocation of the Pell Grant, if it is subsequently awarded. If a Pell Grant

- is awarded, the training provider must reimburse the service provider the ITA funds used to underwrite the tuition portion of the training costs from the PELL Grant.
- E. Program operators should consider all available sources of funds, excluding loans, in determining an individual's overall need for WIOA funds. Resources such as PELL, GI Bill and other federal grants should not be included in calculations of the level of WIOA assistance until the grant has been awarded.

Tuition is the sum charged for instruction and does not include fees, books, supplies, equipment and other training related expenses. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the participant for education-related expense.

20 CFR § 680.310

In accordance with TEGL 19-16, VA benefits for education training do not constitute "other grant assistance" under WIOA eligibility requirements. Therefore, eligibility for VA benefits for training services do not preclude a veteran or eligible spouse from receiving WIOA-funded services, including training funds. Similarly, WIOA program operators shall not require veterans or spouses to exhaust VA-funded training benefits prior to allowing them to enroll in WIOA-funded training.

III. Duration, Cost Limits and Availability

- A. Currently, there is no monetary limit or cap on ITAs. Local Boards set policies on funding limits per customer for ITAs and the maximum duration of training. Customers may select training that costs more than the maximum ITA level when other sources of funding are available to supplement the ITA (e.g., HOPE, Pell grants, and scholarships). The state encourages Local Boards within a region to work together in establishing their policies so that customers of contiguous areas have the same benefits available to them.
- B. ITAs are awarded per semester, quarter or for uninterrupted training coursework. Second and subsequent ITAs will be awarded only for continuing classes in the educational or training institution initially attended, unless there is mutual and justifiable agreement between the service provider and the participant that another training institution or training program is necessary.
- C. An individual who has been determined eligible for an ITA may select a training institution/program from the Georgia Eligible Provider List (EPL) or from another state, provided that the training institution/program is listed on that state's Eligible Provider List, after consultation with a case manager, counselor or coordinator. Unless the program has exhausted funds for the program year, the service provider must refer the individual to the selected training institution/program, and establish an ITA for the individual to pay for training.
- D. Payments may not be made to a training provider until the service provider ensures that the training provider selected is on the EPL at time of payment for tuition and fees under WIOA ITAs.

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IV. Coordination of Funds

LWDAs must develop a policy for coordinating WIOA funding with all other available funding sources such as HOPE_and, Pell, and GI_Bill and detail how all other funds will be used prior to expending WIOA funds.

The LWDA's policy must ensure that participants have applied for HOPE, Pell, GI Bill, and all other appropriate funding sources. WIOA participants may enroll in training while Pell, HOPEope, GI Bill, and other funding sources are pending as long as the appropriate arrangements have been made with the training institution regarding the allocation of all grants and funding sources. The policy shall require career advisors, case managers, and/or service providers to conduct an analysis of the participant's financial needs (cost of attendance) to document a participant's total cost of attending training. This analysis includes, but is not limited to, the costs of tuition, fees, books, supplies, transportation, childcare, living expenses, and other appropriate personal and educational related expenses. The documentation supporting this determination should be maintained in the participant's electronic case file in the WorkSource Portal.

If it is determined through the analysis of the cost of attendance form that the total cost of attending training exceeds the amount available through HOPE and WIOA funding, then Pell funds may be utilized by the participant for living and other appropriate personal expenses during the training period.

V. Payment System

ITAs are designed to identify WIOA funded costs associated with the training cost of attendance. The cost of attendance may include tuition, fees, room and board, books, supplies, and other training related costs required for participation in a specific training program.

The ITA identifies the WIOA obligation for the participant and the participant will be able to access information about the account from the service provider. Each service provider is responsible for maintaining an ITA payment system which ensures that payments made to eligible providers are timely, for the agreed upon amount, ensuring that the provider is on the EPL at time of payment and that the payments are supported by appropriate documentation. Note: Cost of Attendance may also include other expenses that are not incurred through the training provider such as child care, transportation, rent and other living expenses. WIOA funds may be used to assist with such expenses and are considered supportive services. These expenses require proof of expenditure in the participants file.

- A. Training related costs required for participation in a training program include, but are not limited to:
 - $i. \ \ \, Tools \ and \ supplied \ necessary \ to \ participate \ in \ training;$
 - ii. Uniforms and shoes/boots;

- iii. Drug tests, physicals, eye exams, immunizations;
- iv. Background checks;
- v. Application, graduation, and GED fees;
- vi. Credential, license or exam fees;
- vii. Lodging (when a part of the cost of attending training out of area); and
- viii. Auxiliary aides and services necessary for persons with disabilities to participate in training.
- B. Financial responsibility for ITAs remains with the LWDA that developed the ITA, in consultation with the participant, throughout the period of training, regardless of the location of the training provider. The financial responsibility of the LWDA also extends to supportive services.

VI. Documentation

Contact between the case manager, counselor or coordinator and the participant must occur, at a minimum, at the end of each quarter, semester or uninterrupted training course during the lifetime of the training plan. Contact may be made by telephone, through the mail, personal contact or other appropriate means to provide documentation of successful progress.

Documents such as attendance records, grade reports, and statements from the instructing agency, are required as proof of participation. Documentation of status of the provider, either Georgia's ETPL or another state's list, must be maintained in the participant's electronic case file in the WorkSource Portal.

- VII. Per WIOA Sections 122 and 134, as well as 20 C.F.R. § 680.320, training services may be provided in lieu of an ITA when one or more of the following exceptions apply, and the LWDA has fulfilled the customer choice requirements of 20 C.F.R. § 680.340:
 - Such services are OJT, customized training or incumbent worker training or transitional employment;
 - The LWDB determines that there are an insufficient number of eligible providers of training services in the local area to accomplish the purpose of a system of ITAs. The determination process must include a 30-day public comment period and be described in the local plan;
 - The LWDB determines there is a training program of demonstrated effectiveness offered in the
 local area by a community based organization or another private organization to serve
 individuals with barriers to employment. The LWDB must develop criteria (as noted in 20 CFR
 680.320) to be used in determining demonstrated effectiveness, particularly as it applies to
 individuals with barriers to employment;
 - The LWDB determines that it would be most appropriate to award a contract to an institution
 of higher education or other eligible provider of training services in order to facilitate the
 training of multiple individuals in in-demand industry sectors or occupations and such contract
 does not limit customer choice; or

• The training contract is a pay-for-performance contract.

An LWDB may provide training services only if it submits a request to the State for a waiver, per WIOA Section 107(g). The proposed request should be made available to eligible training providers and the general public for public comment for no less than 30 days. Public comments must be included with the request. The request will include: evidence that there are an insufficient number of eligible provider of such a program of training services to meet local demand, information that the LWDA meets the requirements for an eligible training provider under WIOA Section 122, and information that training will prepare participants for an in-demand industry sector or occupation in the local area.