



## PROCEDURE TO PAY FOR OCCUPATIONAL SKILLS TRAINING SERVICES USING AN ITA AND PTA

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**Procedure Number:** 2040a-1

**Effective Date:** October 12, 2022

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Occupational Skills Training, including some self-employment training, is a service provided by an approved training institution and may take many forms: classroom-based training, a combination of classroom and work-based learning under a single training curriculum, on-line training, hybrid (online and classroom based) training, registered apprenticeships, and self-employment training.

### **General Requirements for Funding Training Using ITA as part of a PTA**

- Priority of service applies to the provision of training funded with WIOA Title I resources. While any enrolled job seeker who needs training may be eligible for an ITA, those who meet the priority of services guidelines described in the Workforce Snohomish [Eligibility, Registration and Enrollment policy](#) have priority for these resources over other job seekers.
  - Enrolled job seekers eligible to receive training funded by WIOA Title I resources include Adults, Dislocated Workers, Youth and currently employed workers who do not meet the criteria for [incumbent worker training](#).
- Subrecipients issuing ITAs must give priority to training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area, or an otherwise approved occupation.
- Subrecipients must determine and document that other resources are not available to support the costs of training in case notes. Subrecipients must work with partners to identify resources outside of WIOA Title I funds to support some of all of the cost of training.
- Subrecipients and their staff will avoid organizational and personal conflicts of interest as per the [Workforce Snohomish Conflict of Interest Policy](#) in the provision of Training Services.
- Subrecipients must use an individual training account (ITA), as part of a PTA, to pay the training institution on behalf of the job seeker.

- ITAs will only be provided for approved training programs available on the state [Eligible Training Provider List](#) or training made available via an [Increased Capacity Training Contract](#).
- ITAs may only be provided to enrolled job seekers who
  - Have the skills and qualifications to successfully complete the selected training,
  - Take an active role in managing their service plan (IEP or ISS), and
  - Do not have access to other partner resources to cover the costs of their training.
- ITAs may cover the cost of pre-requisites for a training program if the job seeker otherwise has the skills and qualifications to successfully complete the training, and as long as the training is obtained from an Eligible Training Provider.
- ITAs may cover the costs of tuition, enrollment fees, and other fees such as lab and testing required for coursework outlined in the required course of study; required textbook, supplies and training materials as listed on course syllabi or supply lists; and required tools as listed on course tool lists. Only required costs associated with approved training programs will be covered.
- ITAs may be combined with On the Job Training (OJT), supportive services and other services, as needed to support the job seeker's successful completion of training.
- Workforce Snohomish **will not pay** for training to facilitate the acquisition of degrees, diplomas, or certificates strictly for the sake of education.
- The job seeker must make adequate progress in the training plan and meet other criteria outlined in their service plan to continue to receive training funds.
- ITAs may be used to fund occupational skills training provided outside of Snohomish County or out-of-state, as long as the training appears on the Washington state Eligible Training Provider List, and participant's willingness to travel for training is documented in case notes prior to the provision of approval for such a training expense.
- There is no monetary limit or cap on ITAs; nor is there a limit on the length of the training. Subrecipients shall keep in mind that the intent of WIOA is to get participants trained and into the workforce as quickly as possible. Subrecipients are to base the amount of the ITAs and duration of the training on each eligible participant's needs and circumstances and the availability of program funds.

### **Procedure for the development of an ITA**

Subrecipients must:

- Obtain approval from the subrecipient lead prior to enrollment of the job seeker into training.

- Determine and document in the case notes that a training service is necessary for the job seeker to meet their employment goal, that the training is for an in-demand or otherwise approved occupation, and places the job seeker on the path to self-sufficiency.
- Verify and document in case notes that other partner resources are not available for training services.
  - Job seekers must be provided the opportunity to apply for state and federal financial aid, grants or other resources, as appropriate to support their training.
  - When partner or other funding sources are combined as part of a PTA, each resource must be separately tracked and case noted.
- Provide, and document in case notes the provision of, information for the job seeker to make an informed choice regarding their employment future and the selection of an appropriate training provider, including labor market information to determine whether the training is for an in-demand job or one that is likely to be approved by the site operator, performance data for the training program, expectations for adequate progress and any other requirements of the training, any other information that would help the job seeker make an informed choice.
- Determine and document whether the job seeker is likely to succeed in the training, including assessment of skills and assurance that financial and other supports that will be in place to support successful completion of the training.
- Determine and document in case notes whether the ITA will be combined with OJT, supportive services, or other services covered by WIOA Title I or partner funding sources. Any services provided to the job seeker in addition to the ITA must be documented and tracked separately from the ITA.
- Complete all appropriate ITA forms and supporting documentation, which become part of the job seeker's PTA, and submit such forms to the sub-recipient lead for approval. Subrecipients must provide case notes to document the conversations and plans that have taken place with the client related to training, and **place a copy of all forms into the client file.**

#### **Subrecipient Lead responsibilities**

- Ensure that procedures are in place for each job seeker to make an informed choice in the selection of a training provider and program.
- Ensure that all records of eligibility for participation in occupational skills training, all documents related to the ITA, time and attendance records, if appropriate and necessary, training institution reimbursement information, and transcripts and

grade and/or progress reports are maintained for job seekers who are issued ITAs.

- The subrecipient lead
  - **May** approve a multi-year ITA, as long as the training is for an in-demand occupation or industry or otherwise approved.
  - **May not** approve an ITA that contains insufficient resources for the job seeker to complete the training
- Approve the ITA via case notes and signature on forms.
- Maintain a system of obligating and re-obligating funds, and proactively adjusting obligations for the remaining ITA resource pool.
- Make payment to the selected training institution via electronic transfer of funds through financial institutions, vouchers, or another appropriate method.
  - Payments will be made incrementally based on the job seeker making **satisfactory progress** defined as:
    - completing all courses funded ITA and
    - maintaining a Grade Point Average of 2.0 overall.
  - Copies of the job seeker's grades must be retained in their file and case notes must be updated to indicate that grades were reviewed, progress made, and actions taken as a result.
  - If the information needed to determine whether a job seeker is making satisfactory progress is not be available at the time the job seeker must be registered, the subrecipient lead may re-register the job seeker pending documentation of satisfactory progress. Should documentation of less than satisfactory progress is obtained, the sub-recipient lead must terminate payment for the following quarter.
  - Payment to the training institution is tracked separately from other PTA activities.
- Track all tuition expenditures by participant.
- Provide any and all Federal, State, County, and Workforce Snohomish monitors and auditors with access to records related to ITAs.

#### **Additional Workforce Snohomish Responsibilities**

- Workforce Snohomish will ensure that internal controls regarding the issuance of Training Services are maintained in accordance with this procedure and the Workforce Snohomish Internal Controls policy.