

## **GRWDB Individual Training Accounts, including Out-of-School Youth, Policy**

**Purpose:** A Policy for providing Individual Training Accounts (ITAs) for participants enrolled in Workforce Innovation and Opportunity Act (WIOA) programs, including Out-of-School Youth, ages 16, to 24, was approved at the Oct. 6, 2022, board meeting of the Greater Raritan Workforce Development Board (GRWDB). Policies revisions were approved at the June 26, 2025, board meeting.

**Background:** WIOA Title I-funded training services for WIOA eligible participants are provided through ITAs. Using ITA funds, WIOA Title I eligible participants purchase training services from eligible training providers they select in consultation with a Career Training Services Provider. Participants are expected to utilize information such as skills assessments, labor market conditions/trends, and training providers' performance, and to take an active role in managing their employment future through the use of ITAs.

**Policy:** Residents of Hunterdon and Somerset Counties interested in ITAs must attend a GRWDB contracted or approved Training Center and complete initial intake documents to review their eligibility for an Adult, Dislocated Worker or Youth ITA as defined under WIOA. Once eligibility is determined, applicants will meet with Training Service Provider counselors to discuss available programs and the individual's needs and goals. ITA funding is directed to eligible program participants who:

- Complete an assessment that: Identifies a need for training that leads to self-sufficiency or wages comparable to or higher than wages from previous employment; and demonstrates the participant has the skills and qualifications to successfully complete the training program.
- Complete an Individual Employment Plan (IEP) or Individual Service Strategy (ISS) that identifies the training program with anticipated start and end dates. As part of this process, the Training Service Provider will connect the participant to New Jersey's Eligible Training Provider List (ETPL), a vetted list of training programs which includes a description of the available training programs along with their cost and performance details. The participant will choose three programs to investigate and review, and then write a short essay explaining the reason for their final program selection.
- Are unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training goals
- Select training programs that are: Included on the ETPL and have completed master agreements with the GRWDB and Training Service Provider; and are directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the GRWDB Local Area; and
- Maintain satisfactory progress/grades throughout the training program.

The documentation of these requirements along with supporting material must be documented/noted in the participant's AOSOS record.

The GRWDB Priority of Service Policy, the GRWDB Work Based Training Policy and the GRWDB Youth Work Experience and Incentive Payment Policy, along with other established GRWDB policies and procedures are also considered as part of the overall ITA process in the GRWDB Local Area.

In the event the participant's request for training is denied, the participant may request a review with the director of the Training Service Provider. A participant's request for review must be made within five (5) working days of the notification of the denial of the request for training. Training denial requests will only be considered if the requested training is determined not to be in a demand occupation, or on issues relating to the assessment process. Not subject for review is denial based on training requests exceeding maximum limit.

The review must be completed within five (5) working days of the request. The request must be made in writing and be included in the participant's file. The participant and the Complaint Officer must be notified of the decision. The participant must be notified of the right to request a review by the GRWDB Director within five (5) days of the notification of denial. Should the Director deny the request, an appeal can be made to the NJ Department of Labor and Workforce Development. This must be in writing, signed, dated, and addressed to the Commissioner, NJ Department of Labor and Workforce Development, CN 055, Trenton, NJ 08625."

#### **A. Coordination of WIOA Training Funds and Other Federal Assistance**

GRWDB WIOA Training Service Providers must consider the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the cost of their training or require assistance beyond that available under grant assistance from other sources to pay the costs of such training. In making the determination, WIOA Training Service Providers may take into account the full cost of participating in training services, including the cost of supportive services and other appropriate costs.

Additional grant assistance may be available through sources such as but not limited to: Temporary Assistance for Needy Families (TANF)-WorkFirst; Title IV Programs such as Federal Pell Grants, Academic Competitiveness Grants, Federal Supplemental Educational Opportunity Grants, or Federal Work-Study; and state-funded grants.

As stated in WIOA Final Rules, page 56121 and TEGL 19-16, Department of Veterans Affairs benefits for education and training services are not included in the category of "other resources of training grants" listed in 20 CFR sec. 680.230(b). Therefore, veterans and spouses are not required to first use any available benefit entitlements associated with their military service before being considered eligible for WIOA-funded

training, and Training Service Providers are not required to consider the availability of those funds.

Training Service Providers must consider and document in the participant file the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. The use of WIOA funds to make payments towards a personal loan of an otherwise eligible participant is prohibited. However, the existence of a federal loan, regardless of the status, must not impact ITA eligibility determinations.

Training Service Providers must work with participants to identify opportunities to braid funding sources as appropriate and document the availability and coordination of other training funds in the participant record.

### **B. ITA Authorization**

ITAs must be approved by a WIOA Training Service Provider authorized representative prior to issuance. ITA authorization must be documented in the participant record.

ITAs are authorized only for training programs listed on the Eligible Training Provider List (ETPL), as required in WIOA Section 134(c)(F)(iii). ITA funds are paid directly to the training provider using the Training Service Provider's fiscal system, working with the GRWDB. Training Providers will be reimbursed in a 50-50 split: 50 percent when the participant has finished half of the course and 50 percent when the participant has successfully completed the course. ITAs may be used for pre-apprenticeship programs however, only pre-apprenticeship programs listed on the ETPL may be approved.

ITAs may be authorized for training programs in online training if the training program is listed on the ETPL.

### **C. Funding Mechanisms other than ITAs**

Mechanisms other than ITAs may be used to provide training services that do not rise to the level of occupational skills training, including individualized services such as workforce preparation activities or short-term prevocational services. WIOA Sections 134(d)(3)(C) and 134(d)(3)(C)(vi) describe these services. Individualized services may include literacy, internship, work experience and other training activities that may not provide formal occupational skills training or be appropriate for an ITA.

Similarly, short-term prevocational services are designed to prepare a participant for work but do not provide formal occupational skills training. As such, ITAs are not authorized for individualized short-term prevocational training. Short-term prevocational training may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct, or other non-occupation-specific topics that are intended to prepare individuals for unsubsidized employment or training.

20 FR 680.320 provides additional guidance regarding exceptions to the use of ITAs.

#### **D. ITA Funding Limit and Time Frame**

The general ITA funding limit in the GRWDB Local Area is \$5,000.00.

The maximum ITA limit is not an entitlement. The amount of each participant's ITA award is determined on an individual basis. Funding amounts will take into account the total costs of the selected training program, any other financial assistance available to the participant, and available WIOA funding. Participants may select training programs that cost more than the maximum authorized limit when other sources of funds such as Pell Grants, scholarships, severance pay, or other resources are available to supplement the ITA.

The ITA funding can only include the cost of training services such as instructor salaries and benefits, classroom space, instructional materials, academic fees, educational testing and certification, tuition, books, individual materials, supplies, tools, and equipment.

An ITA may fund prerequisite training to a vocational training program if it is required by the educational institution.

The GRWDB Supportive Services Policy may be used to assist ITA participants.

The goal of ITA training is to equip the participant as quickly as possible with marketable skills that will enable the participant to get back into the job market. As such, ITA participants must complete their training within one year of beginning the application process. If the participant needs additional time, the participant will work with their Training Center navigator to document and justify why additional time is needed. The time period being requested also must be included. This documentation will then be presented for review to the GRWDB Director for a final determination.

ITA recipients may not apply for a new ITA until four years after their successful ITA completion.

#### **E. ITA Continued Funding, Satisfactory Progress**

Continued funding of an ITA is contingent on availability of WIOA funds and on the participant's satisfactory progress in school, except for good cause. Training Service Providers must review the participant's training progress and expenses quarterly or more frequently depending on the training institution's schedule. A participant'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 individual's approved area of study, or
- Sufficient credit hours to finish the approved course of study within the timeframe established under the approved training plan.

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 plan.

Training Service Providers must receive training progress reports (i.e. transcripts) from participants in adequate time to process tuition payments. Progress reports, transcripts, or other training-issued updates must be part of the participant's record.

Training Service Providers, in collaboration with participants, must develop a service strategy to overcome barriers impacting progress for participants who are not earning satisfactory progress in their coursework. WIOA ITA funding may be terminated if participants do not earn satisfactory progress for two (2) or more consecutive school terms (i.e. quarters, semesters, etc.).

"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 participant or a member of the participant's immediate family,
- Severe weather conditions or natural disaster precluding safe travel,
- State-or nation-wide emergencies
- Destruction of the participant's school records due to a natural disaster or other catastrophe not caused by the participant,
- Acting on advice received from an authority such as the training provider, instructor, or case manager,
- Training is delayed or cancelled,
- Accepting stop-gap employment with hours or other work conditions that conflict with the training, or
- Accepting goal-related employment prior to completion of training.

#### **F. ITA Modifications**

An ITA may be modified to ensure the participant attains their educational goals and subsequent employment. In some circumstances, such as when a program of training is removed from the ETPL, when extraordinary program expenses develop, or when training is disrupted by state- or nation-wide emergencies, the participant and career planner must agree on whether to complete the plan of training with the existing provider, seek a similar program, or discontinue training.

When a program of training is removed from the ETPL, WIOA participants in that program can complete their training. However, an ITA should not be modified or extended for a participant beyond the original plan approval as it relates to that former program. Training Service Providers must use discretion in determining the amount of ITA modifications, and document modifications in the participant's case notes

#### **G. ITA Obligations**

In order to obligate ITA funds in the Greater Raritan Local Area, a Purchase Order (PO) must be written for individuals identified to receive an ITA award, following the financial guidelines of Somerset County, the fiscal agent for the GRWDB. The obligation would document a three-way commitment between the participant, the Training Service Provider, and the training institution. The Training Service Provider must work with the

training institution to provide timely billing and payments. Invoices are due by the 15<sup>th</sup> of each month for payment. Invoices sent 60 days or more after the ITA participant's successful completion of the program may not be paid or reimbursed by the GRWDB to the service provider.

#### **H. Recovery of Tuition Funds**

In the event a participant discontinues training, the Training Service Provider must demonstrate due diligence to ensure the recovery of WIOA funds.

#### **I. Documentation Requirements**

The following must be recorded in case notes and be part of the training service recorded in the participant's record:

1. Documented assessment results that justify the need for training and includes evidence that: The participant has the skills and qualifications necessary to successfully complete the training program; and the participant is unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone.
2. Evidence the selected program of study will result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.
3. Evidence the selected training program is directly linked to an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the Greater Raritan Local Area.
4. Completed IEP (Adult and Dislocated Worker) or ISS (Out-of-School Youth ages 16-24) documenting the selected program of study, anticipated and actual start/end dates and training outcomes.
5. Evidence the participant is unable to obtain grant assistance from other sources to pay the costs of training or require assistance beyond available grant resources from other sources.
6. Verification of FAFSA or other financial award status, if applicable.
7. Evidence the selected training program is on ETPL and that the training program has a Master Agreement with the GRWDB.
8. Authorization of the ITA and any approved modification.
9. Copies of transcripts, grades, progress reports or other documentation providing evidence of the participant's satisfactory progress in training.
10. Training outcome. This includes: a reason for the participant's discontinuation of training and the change in service delivery as a result of this decision; and a copy of degree, certificate, or other evidence of satisfactory completion of training.