

<b>SERVICE DELIVERY/ FISCAL</b>	<b>ITA Policy for Youth</b>
<b>Classification:</b>	Title I Youth
<b>Date Adopted:</b>	06/22/16 <b>Modification #1:</b> 05/10/17
<b>Background:</b>	To establish policy for the issuance of Individual Training Accounts (ITAs) under the Workforce Innovation and Opportunity Act (WIOA), Title I Youth Services, which Service Provider Representatives and Career Specialists are to follow when issuing ITAs to eligible enrolled CareerFirst participants.
<b>Policy:</b>	<p>The purpose of this policy and procedures it to establish policy for the issuance of Individual Training Accounts (ITAs) under the Workforce Innovation and Opportunity Act (WIOA), Title I Youth Services, which Service Provider Representatives and Career Specialists are to follow when issuing ITAs to eligible enrolled CareerFirst participants. CareerFirst seeks to improve occupational skills training and ensure that said training aligns with high growth/high demand occupations in target industries. This policy and procedures establishes the standards to be adopted and immediately implemented by WIOA CareerFirst.</p> <p><b>I. Background</b></p> <p>A) The Workforce Innovation and Opportunity Act (WIOA) provides that Youth who are determined eligible and suitable for training may access WIOA funds through an Individual Training Account (ITA).</p> <p>B) In order to ensure that our participants experience a quality training experience which positions them to find a job paying family sustaining wages, the Smoky Mountains Area Workforce Board (SMAWB or workforce board) has developed guidelines for ITA eligible programs.</p> <p>C) The workforce board reviews data on the local economy each year and selects target industries. As of June, 2016, these include: Automotive; Chemical Products &amp; Plastics; Transportation, Logistics &amp; Distribution Services; Business Services; Healthcare; Advanced Manufacturing; Energy Technologies; Entertainment; Retail; and Construction. The Tennessee Department of Economic and Community Development also identifies statewide target industries.</p> <p>D) The occupational training described here shall be provided only by those institutions which have programs authorized by the workforce board or another Local Workforce Development Board (LWDB) and are reflected on the Statewide List of Eligible Training Providers for the local area. All providers must complete the training provider certification process established by the workforce board in order to provide services within LWDA 2. Only providers with approved programs in the target industries and occupations described above will be authorized to receive payment with WIOA CareerFirst ITA funds.</p> <p>E) NOTE: ITAs are allowed for out-of-school youth ages 18-24 (out-of-school youth ages 16-17 are not eligible for ITAs) per WIOA Section 129(c) (2)(D) and proposed 20 CFR 681.550.</p> <p><b>II. Policy</b></p>

This document sets forth the overall policy requirements for ITAs for youth in LWDA 2. It does not establish specific procedures for the ITA system.

### **III. Process for Requesting an Individual Training Account (ITA) for Youth**

A WIOA CareerFirst Service Provider Representative may request an ITA on behalf of a participant who has been determined eligible and in need of training services. Service Provider Representatives will assist participants in choosing from the list of WIOA certified training programs. The selected programs must be clearly related to the goals outlined in the participant's Individual Service Strategy (ISS) for youth. A final selection must be made by the participant and service provider representative and submitted with the request for the ITA along with all supporting documentation.

### **IV. Training Assessment Review**

WIOA Service Provider Representatives requesting an ITA on behalf of a participant must submit the request to the Career Specialist for review and data entry into the Virtual One Stop (VOS). The review will be the final step prior to that participant enrolling in a WIOA-certified training program. The review request is conducted according to guidelines and policies developed by the workforce board. This will entail a review of the participant's file for verification that:

- A) The participant is a registered WIOA CareerFirst Youth;
- B) All authorized WIOA eligibility documentation is listed;
- C) The participant has reviewed his options with the service provider representative;
- D) The Individual Service Strategy (youth), detailing the participant's proposed career plan and training needs has been completed;
- E) Alternative funding sources have been explored and award amounts are documented on the Student Needs Assessment (SNA) by WIOA Fiscal;
- F) The requested training program is on the State of Tennessee Eligible Training Providers List;
- G) A training service is opened for participant in VOS;
- H) The ITA amount requested is the same as or lower than the cost indicated in VOS for the requested program;
- I) Payment arrangements have been made by the Service Provider Representative for participants whose tuition cost is beyond the ITA cap; and

Once the CareerFirst Training Assessment Review is completed by the Career Specialist and keyed into VOS, the ITA Request with supporting documentation will be submitted to the WIOA Fiscal. The Career Specialist will communicate to the Service Provider Representative that the Training Assessment Review is complete. No participant may attend classes until the ITA confirmation of approval is complete.

### **V. Use of ITAs for CareerFirst**

The NPRM, dated April 15, 2015, has granted permission to permit eligible youth to select approved ITA programs while retaining their youth classification. Eligible youth are WIOA youth ages (18-24) or Out-of-School as defined by WIOA. The following factors should be considered when using ITAs for Youth Occupational Training:

- A) The Service Provider Representative must have determined that occupational skills training through the ITA system is necessary and appropriate in order for the individual to secure full-time employment that leads to self-sufficiency;
- B) The use of ITAs should offer options for participant choice and not be used as an enticement to terminate traditional academic programs;
- C) The use of ITAs will enhance, not supplant the current delivery of youth services; and
- D) The youth must be provided access to the 14 elements of program services for youth identified in WIOA.

**VI. Occupational Selection**

The WIOA requires that the selected training program be directly linked to employment opportunities in the local area as well as employment in high demand occupations. With the guidance from Service Provider Representatives, participants will be able to make informed decisions based upon labor market information.

**VII. ITA Cost Limits**

The workforce board has established a 2-tiered (\$8,000 maximum and \$15,000 maximum) tuition limit for one training program. These limits do not include the costs of books, tests, uniforms or any other educational fees.

**VIII. Obtaining a Second ITA**

- A) Unless otherwise approved by the workforce board, there is a lifetime limit of one ITA per person for one training program, except in cases where the participant:
  - B) Has successfully completed one ITA – funded training course; and
  - C) Is requesting a training program in the same or a related subject/field (i.e., along a career ladder) which will provide additional skills to support their move toward self-sufficiency, or where the subsequent ITA provides training in a field where the customer is able to use transferrable skills; and/or
  - D) Is still income eligible by virtue of earning below the applicable WIOA self-sufficiency income level, based on the job the participant obtained as a result of the first ITA.

A participant may not utilize ITA funds for a subsequent unrelated training course and may not request ITA funds if he/she withdrew from or failed to complete the initial ITA funded training course. A participant receiving a subsequent ITA may only access the balance of the original lifetime ITA funding maximum amount as applicable based on the voucher limit tiers.

**IX. ITA Duration Limits**

For most ITA programs, there is no specific limit on the amount of time allowed for completion of training. However, an ITA for an associate degree program will only be approved if the participant has less than 24 months remaining and an outstanding balance of less than the maximum ITA limit for the applicable program (i.e., \$5,000 to \$10,000). These participants must demonstrate that they have a realistic plan that

	<p>will permit completion of the degree program within this timeframe. This should be set forth in their ITA application.</p> <p><b>X. Policy Additions and Clarifications</b></p> <p>The workforce board staff is authorized to issue additional instructions, guidance, forms, etc., to further implement the requirements of this policy. The Dean of Workforce Development or his/her designee may approve exceptions to this policy.</p> <p>The procedures for requesting and redeeming ITAs for individual participants will be described in the WIOA ITA Manual. The manual will contain the forms and procedures that are to be used to submit ITA requests.</p>
<b>References:</b>	WIOA Section 129()(2)(D) – Youth Proposed 20 CFR 681.550 - Youth