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SBWIB

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In-demand - refers to occupations, industry sectors or clusters, and career pathways that have been identified in the state, regional, and/or local Workforce Development Plan as emerging or growing; as a priority for local workforce partners otherwise having the best job prospects due to the workforce needs or hiring demands of employers.

Individual Training Account (ITA) - is a payment agreement established on behalf of a participant with a training provider. (20 CFR §680.300). Based on individual assessment and funds available an ITA may be awarded to eligible adults, dislocated workers and out of school youth ages 16-24.

Pre-apprenticeship Skills Training - is defined (20CFR 681.480) as a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship programs and has documented partnership (letter of commitment) with at least one , if not more, approved apprenticeship program(s). Such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a registered Apprenticeship program. In California, the apprenticeship partner must be approved by the California Department of Industrial Relations, Division of Apprenticeship Standards (DIR/DAS).

Program of Training Services - is defined (20CFR §680.420) as one or more courses or classes, or a structured regimen that provides training services leads to one of the following:

- (a) An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State involved or the Federal government, an associate or baccalaureate degree;
- (b) A, secondary school diploma or its equivalent;
- (c) Employment; or
- (d) Measurable skill gains toward a credential or employment.

POLICY:

CRITAs are one training option available to eligible and appropriate participants when it is determined by a career services coordinator that they will be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone. An ITA is limited in cost and duration and must result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

All training providers listed on the Interstate Training Resource and Information Network (I-TRAIN) are also identified on the State approved

Eligible Training Provider List (ETPL) which will be utilized by the career services coordinators for referral of approved training.

CRITA Authorization. The CRITA must be approved by the Career Services Manager or designee prior to issuance (see attached). CRITAs are authorized only for training programs listed on the I-TRAIN/ETPL, as required by WIOA Section 134 (c)(F)(III). Registered Apprenticeship programs automatically qualify to be on the list of eligible training providers as long as the Registered Apprenticeship program remains registered. CRITAs may also be used for pre-apprenticeship programs however, **only pre-apprenticeship programs listed on the I-TRAIN/ETPL may be approved.** CRITAs may be authorized for training programs in other states or online training if the training program is listed on the ITRAIN/ETPL or there a exists reciprocity agreements with other states. **CRITAs are not authorized for individualized career services** such as short-term prevocational training. Short term prevocational services may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct, or other non-occupation-specific topic are intended to prepare individuals for unsubsidized employment or training.

Modifications to the ITA. An ITA may be modified to ensure the individual attains their educational goals and subsequent employment. In some circumstances, such as when a program of training is removed from the I-TRAIN/ETPL, or when extra ordinary program expenses develop, the participant and career services coordinator 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 state ETPL/I-TRAIN, WIOA participants in that program can complete their training. However, the ITA should not be modified or extended for a participant beyond the original plan approval as it relates to a program of training that is no longer available on ETPL/I-TRAIN. All instances must be documented in the case record.

INDIVIDUAL TRAINING ACCOUNT (ITA)

A. ITA Requirements

1. **Program Eligibility.** An ITA will only be approved for occupational training programs that are on the State approved Eligible Training Providers List (ETPL) and the SBWIB's Interstate Training Resource and Information Network (I-TRAIN). Participants must be able to use their ITAs to acquire training services from any training provider on the I-TRAIN/ETPL.
2. **Duration and Amount.** The length of training shall not exceed an eighteen (18) calendar month period **without prior approval from the SBWIB, Inc., Chief Executive Officer.** WIOA formula funds will be tracked for the purposes of ITA management. The price per training for all participants served by an individual One-stop Career Center or subrecipient may not exceed an average of \$7,500.00 at

any given time **without prior written approval by the SBWIB Inc., Chief Executive Officer.**

3. **Use of ITA Funds.** ITA funds are only authorized to pay for training related costs that include, but are not limited to such items as books, fees, supplies, tools and other items required to completing the training program. ITAs can also be used to support placing adults and dislocated workers in registered apprenticeship programs and pre-apprenticeship training as defined in §680.470. Additional supportive services and needs-related pay also be provided as outlined in §§680.900 through 680.970.
4. **Allowable Payments.** Payments may be made under an CRITA for the following services:
 - a. **Occupational skill training:** Tuition for training leading to an industry-recognize degree, certificate, or other credential that enables a participant to enter into an occupation consistent with an in-demand industry sector or occupation or sectors that have a high potential of sustained demand or growth in the South Bay Workforce Development Area or in the planning region or in another area in which the participant is will to travel or relocate.
 - b. **Related Expenses:** Books, required equipment, and license exam fees for the training program that not covered by a grant or other financial aid may be paid through the CRITA, provided that evidence is submitted establishing their cost. The amount provided for related expenses will be equal to the amount charted to the provider or participant.

To be eligible for payment, the training providers may submit all invoices, accompanied by the required attendance records, progress evaluations or equivalent reports or transcripts indicating the participant's progress, certificate(s) of completion and other training records requested by the career services coordinator or SBWIB, Inc. fiscal staff.

5. **Degree Programs.** CRITAs may not be used to pay for instruction leading to a bachelor's degree or above. An ITA may be used to pay for content area instruction courses leading to an associate's degree.

B. ITA Procedures

1. Except as provided under WIOA and associated regulations, training services are to be provided to eligible participants using the ITA process prescribed by the One Stop Delivery System.
 - a. An ITA shall cover the cost of training including tuition and other training-related items required for training by the training provider.

- b. No more than one (1) ITA may be issued to a participant within a one-year period.
 - c. An ITA may be issued only to a participant that has not received WIA/WIOA ITA training in the last 24 months of participation and Exit. Waivers and justification to this requirement may be approved only by the SBWIB, Inc., Chief Executive Officer.
 - d. In no event shall an ITA carry a balance after the program of training is either completed or terminated. All funds must be expended/billed or de-obligated with cause.
2. Priority of Service. Section 134 (c)(3) of WIOA establishes priority of service requirements with respect to adult employment and training activities. *Priority of services must be given to recipients of public assistance, **other** low-income individuals, and individuals who are basic skills deficient; as well as veterans and eligible spouses.* Priority must be provided in the following order:
- a. First, to veterans and eligible spouses who are also included in the other groups are given statutory priority.
 - b. Second, to non-covered persons (that is, individual who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
 - c. Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
 - d. Last, to non-covered persons outside the groups given priority under WIOA.
3. The career services coordinator at the One-Stop Center completes the left-hand side of the Client Referral Individual Training Account (CRITA) form. The CRITA is given to the client and delivered to the selected training provider with the assistance of and referring career services coordinator. The training provider completes the information needed on the right-hand side of the CRITA and returns a copy (i.e., email or fax) to the referring One-Stop Center and a copy to the South Bay Workforce Investment Board, Inc. (SBWIB, Inc.) fiscal staff. The SBWIB, Inc. fiscal staff verifies the client's registration/enrollment in the California Job Opportunity Browse System (CalJOBS) and approves the CRITA, which sets aside funds for the training. The SBWIB, Inc. fiscal staff will return a copy of the approved CRITA to the referring One-Stop Center and training provider. A copy of the approved CRITA is to be maintained in the client case file.

4. South Bay Workforce Investment Board shall ensure that all training activities are provided at sites that are accessible to individuals with disabilities, and that all reasonable accommodations are made to provide services to this population.

C. WIOA Participant Requirements

1. WIOA ITA funding shall be used to provide training services to eligible adults and dislocated workers who:
 - a. After an interview, evaluation or assessment, and career planning with a career services coordinator or one-stop partner they have determined that the individual:
 - i. Is unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from their previous employment through career services alone;
 - ii. Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
 - iii. Has the commitment and skills/qualification to successfully participate in the selected program of training services.
 - iv. Such justification and assessment shall be individually documented in the case record (i.e., IEP and case notes).
 - b. Is unable to obtain grant assistance from other sources to pay the costs of their training or requires assistance beyond available grant resources from other sources, such as Pell Grants in order to complete their training
2. WIOA ITAs for Out of School Youth (OSY), ages 16-24 as deemed appropriate, such training must:
 - a. Be outcome-oriented and focused on an career pathway goal specified in the Individual Service Strategy (ISS);
 - b. Be of sufficient duration to impart the skills needed to meet the career pathway goal; and
 - c. Lead to the attainment of a recognized postsecondary credential that aligns with an in-demand industry sectors or occupational clusters under the South Bay Workforce Development Area or region.
3. Participant in qualifying programs must apply for Pell Grants and other financial assistance grants as appropriate. Funding should be

coordinated to the extent possible with other sources of assistance as detailed in WIOA §134 (c)(3). WIOA funds may only be used to cover costs described in “Use of ITA Funds” above, and may not be used for living expenses.

4. Withdrawal or Removal from Program.

- a. **Participant Withdrawal.** Participants may withdraw from an ITA-funded program within five (5) class days of the beginning of such program without impacting their eligibility for ITAs. If a participant withdraws within the initial five-day period, they shall not be considered to have enrolled in the program, and shall not count against the performance levels of the eligible training provider.

If a participant withdraws after initial five day period, such withdrawal must be accompanied by a statement of good cause submitted to the career services coordinator and signed by the educational institution and the participant. Good cause must demonstrate a reasonable basis for withdrawal including life events or the participant’s inability to grasp the course requirements. If the career services manager or designee approves such withdrawal, the participant shall maintain eligibility for ITAs. If the career services manager or designee does not approve such withdrawal, the participant may be barred from receiving an ITA for a period of one (1) year following such withdrawal. Such occurrence counts against the performance levels of the eligible training provider.

- b. **Removal from Program.** Participants must remain in good academic standing as defined by the eligible training provider and otherwise comply with the requirements of the selected training program in order to maintain eligibility for funding. A training provider may remove a participant from a training program if such removal is accompanied by a statement of good cause submitted to the designated representative. The eligible training provider shall be eligible to receive all or part of the funds for the portion of training received and payable under the ITA at the time of the removal according to the provisions of the contract. The career services manager or designee must agree with the statement of good cause to remove or terminate the training and promptly notify the SBWIB, Inc. fiscal staff of such occurrence within five (5) business days in order to deobligate the WIOA funds.
- c. **Reimbursements.** If a participant withdraws or is removed from a program within five (5) class days of the start of the program, that participant shall not be considered enrolled in the training program and the eligible training provider shall not be entitled to receive ITA funds for to that participant’s training.

C. Participant Tracking

1. All adult and dislocated worker participants will be tracked in the CalJOBS participant tracking system. Training activities shall be tracked as follows:

- a. I-TRAIN/ETPL: Eligible adults and dislocated workers enrolled and participating in a training activity with a training provider listed on the I-TRAIN/ETPL and all or part of the tuition is being funded by WIOA, he/she shall be enrolled using *Activity Code 300 – Occupational Skills*. Tuition and all appropriate training related costs may be charged as training expenditures.
- b. When enrolling an adult or dislocated worker into a pre-apprenticeship training program, use *Activity 307*. (Reference *WSIN 16-46, Pre-Apprenticeship Training Programs on the ETPL*).
- c. When an individual is participating in a training activity with a training provider not listed on the I-TRAIN/ETPL, he/she shall be enrolled using *Activity Code 328 – Non ETP Provider*. WIOA funds cannot be used.

WIOA does not allow for the payment of tuition in full or in part through an ITA for a training provider that is not listed on the I-TRAIN/ETPL, however, the associated “training related” costs may be allowable. These “training related” costs are not considered as Training Expenditures, rather they must be charged to the “Supportive Services” cost category. A financial need assessment of the individual must be made for such services and documented in the participant file.

- d. When an enrolled individual is participating in a training activity with a training provider that has a headquarter outside of California and does not have an in-state training facility, but the provider is listed on another State’s ETPL, he/she shall be enrolled using *Activity Code 346 - Out-of-State Training Provider Other ETPL*. Tuition and all appropriate training related costs may be charge as training expenditures.

Note: The career services coordinator/sub recipient staff must include a case note in the participant file explaining why this provider was selected instead of a California I-TRAIN/ETPL provider, and include a printout from the Internet with a date and time on the printout verifying the provider is listed on another State’s ETPL.

2. Out-of-School Youth (OSY), Ages 16-24

All Out-of-School Youth will be tracked in the CalJOBS participant tracking system. Training activities shall be tracked as follows:

- a. I-TRAIN/ETPL: When an OSY is participating in a training activity with a training provider listed on the I-TRAIN/ETPL, he/she shall be enrolled using *Activity Cod 416 - Occupational Skills Training*. Tuition and all appropriate training related costs may be charged as training expenditures.
- b. To enroll an OSY into a pre/apprenticeship training program, use the following *Activity Code 431- Pre-Apprenticeship program or Activity Code 432 – Apprenticeship program. (Reference WSIN 16-46, Pre-Apprenticeship Training Programs on the ETPL)*.
- c. When an OSY is participating in a training activity with a training provider that is not listed on the I-TRAIN/ETPL. WIOA funds cannot be used for training.

WIOA does not allow for the payment of tuition in full or in part through an ITA for a training provider that is not listed on the I-TRAIN/ETPL, however, the associated “training related” costs may be allowable. These “training related” costs are not considered as Training Expenditures, rather they must be charged to the “Supportive Services” cost category. A financial need assessment of the individual must be made for such services and documented in the participant file.

When an eligible OSY is enrolled or participating in a Post-Secondary Education training activity, he/she shall be enrolled using *Activity 421 – Post-Secondary Education*. Tuition cannot be made with WIOA funds. Assistance can be made with book fees, school supplies, and other necessary costs using “Supportive Services”. A financial need assessment of the individual must be made for such services and documented in the participant file.

3. Youth (In-School Youth) (ISY), Ages 14-21

All ISY’s supportive services will be tracked in the CalJOBS participant tracking system, when applicable as follows:

- a. WIOA funds **may not be utilized** to provide ITAs to In-School Youth. ISY may, however, be assisted with books, fees (not tuition), school supplies, and other necessary costs, and these costs shall be charged as “**Supportive Services**”. A financial need assessment of the individual must be made for such services and documented in the ISS file. ISY receiving this type of supportive service shall be enrolled in **Supportive Service: Post-Secondary Academic Materials – Activity Code 493**.

- b. ISY who are attending post-secondary education that the one-stop centers are supporting through supportive services as outlined in the previous paragraph should also be enrolled in **Enrolled Post-Secondary Education – Activity Code 421.**

ACTION:

Ensure that all career center staff and partners are informed and adhere to the contents stated in this directive.

INQUIRIES:

Any change that deviates from the above policy must be approved by the SBWIB, Executive Director on behalf of the SBWIB. If you have any questions regarding this directive, please contact the SBWIB, Inc., Finance Manager at (310) 970-7700.

Jan Vogel, Executive Director

Attachment

Client Referral Individual Training Account-(CRITA)

Approved by the Executive Committee Minutes: May 10, 2017