

**GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT BOARD (GMLWDB)**

**GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT AREA**

<b>EFFECTIVE DATE:</b>	July 1, 2020
<b>DURATION:</b>	Indefinite
<b>POLICY:</b>	Individual Training Account (ITA) Policy
<b>PURPOSE:</b>	To provide a uniform procedure and guidance for determining eligibility and issuing training vouchers to WIOA participants who seek training services via informed consumer choice to receive an Individual Training Account
<b>REFERENCE(S)</b>	20 CFR 683.510; 20 CFR 680.340(f); WIOA Section 3(5); WIOA Section 107(g) (1) (B); WIOA Section 134(c) (3) (B) (ii); WIOA Section 134(c) (3)

**Background:**

Individual Training Accounts have previously been used to support the training services of individuals under the Workforce Innovation Opportunity Act (WIOA). The Workforce Innovation Opportunity Act (WIOA) provides more flexibility for American Job Center (AJC) staff to issue ITAs for apprenticeship programs. An ITA is used by a participant to access training services from an entity on the State's approved Eligible Training Provider List (ETPL) and the local High Priority Occupation (HPO) List. Under WIOA, the priority of service must be provided regardless of the level of funds. WIOA also expands the priority to include individuals who are basic skills deficient, as defined in WIOA Section 3(5). The LWDB may contract training services in some circumstances involving work-based training; some work-based training consists of on-the-job training (OJT), customized training, registered apprenticeship, incumbent worker training, and transitional jobs. In rare circumstances, WIOA also allows a Local Workforce Development Board (LWDB) to provide the training services if it receives a waiver from the Governor (WIOA Section 107(g) (1) (B)). In an instance where a waiver is granted, all WIOA firewall and State conflict of interest policy requirements must be satisfied and strictly adhered to. LWDBs must use WIOA funds for support and other needs of the individual while coordinating funding for ITAs with funding from other Federal, State, local, or private job training programs or resources to assist individuals in obtaining training services.

## Who Receives Training Services:

After conducting an interview, evaluation, assessment, or career planning a One-Stop Center/Partner determines the participant is:

- Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment through career services.
- In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment through career services.
- To have the skills and qualifications to participate successfully in training services

### I. Training Requirements:

The selected training program must be approved by GMLWDA and appear on the State of Tennessee Eligible Training Provider List (ETPL), which can be found at [www.Jobs4TN.gov](http://www.Jobs4TN.gov). Training providers outside of the State of Tennessee must be on the eligible training provider list for that state. Additionally, the career field and associated training course must be included on the local High Priority Occupations (HPO) list.

- a. ITAs are restricted to programs that address the skills needed for occupations in demand (20 CFR 680.340 (f)). This is **IDGH** priority as defined by the LWDB.

### II. Participants Eligibility Requirements:

The participant must meet the following requirements:

1. Meet the WIOA eligibility criteria provided in GMLWDA Program and Service Eligibility Document.
  - a. WIOA Eligibility Documentation
    - i. Date of birth (e.g., State-Issued Photo ID, birth certificate)
    - ii. Proof of eligibility to work in the U.S. (e.g., social security card)
    - iii. Selective Service documentation (applicable to adult males)
    - iv. Proof of Citizenship and Family size (e.g., birth certificate)
    - v. Proof of Address (e.g., State-Issued Photo ID, lease agreement)
  - b. High School Diploma or Equivalency
    - i. Or participant must be dual-enrolled in an Adult Education program;
    - ii. excludes participants in an OJT or an Apprenticeship Program
  - c. Post-secondary Transcripts/Records, if applicable
  - d. Proof of Income (Earned or Unearned) Updated Resume
  - e. Cost of Program and class schedule from Provider
  - f. Financial Aid Awards/Need Assessment Form Completed by Provider
  - g. Completed Job Search Logs
  - h. Be in good academic standing, if he/she is currently enrolled in school with a current grade not lower than a "C" average.
    1. If a participant has signed a loan agreement prior to WIOA approval with an ETPL approved provider he/she is not eligible for WIOA funding.
  - j. No funding to a provider whose program creates a financial barrier to the participant.
2. Have completed career services and be unable to obtain or retain employment leading to a self-sufficient wage.
3. Complete assessment(s) required for the specific training program (e.g., Initial Assessment, Holland or Interest profile, TABE and Key Train/Career Readiness Certificate (CRC)).
4. TABE assessment should be administered to individuals that meet what has the minimum academic

level established by the chosen industry to be successful.

5. Complete any prerequisites required by the Training Provider for training program specifics.
6. Complete an Individual Employment Plan (IEP) and Objective Assessment Summary (OAS) to identify the participant's needs and plans for addressing such needs
7. Choose a training program that is consistent with his/her skills, interests and abilities as evidenced by the assessments referenced above under Eligibility Requirements.
8. Be unable to receive assistance from other sources to pay the costs of training, pursuant to Section IV below

The participant has completed an official ITA request form, application, etc. to officially request ITAs.

### **III. Coordinating Non-WIOA Funds:**

WIOA Section 134(b) (3) (B) (i) requires that WIOA training funds be coordinated with other grant sources for training, e.g., Pell grant. WIOA limits funding for training to individuals who are unable to obtain grant assistance from other sources to pay the costs of their training, or require assistance beyond the assistance made available under other grant assistance programs.

Accordingly, One-Stop staff will coordinate funds available with the financial aid office of the training provider. Training Providers must complete a Financial Aid Award/Need Assessment Form for participants as a means to determine a shortage/surplus of resources. All available sources of grant funds (excluding an application or offer for a loan)(e.g., Federal Pell grant, lottery scholarship, Wilder-Naifeh, Tennessee Promise, loan that the client has taken out) should be considered in determining an individual's overall need for WIOA funds.

### **IV ITA Limitations:**

1. The maximum, lifetime ITA amount is \$4000.00 per person ("Maximum ITA Amount") and can cover tuition and the costs of applicable training-related supportive services (e.g., uniforms, books, supplies, tools) pursuant to GMLWDA Supportive Services Policy (2014:06).
  - a. GMLWDB Executive Director can grant exceptions on a case-by-case basis up to \$7,000. Any formal request must be submitted in writing.
2. An ITA is not limited to programs that can be completed in twelve (12) months or less. For programs two years or less, it can be in the last year. For programs longer than 2 years, especially apprenticeships the Executive Director can waive the requirement or determine another spending window.
  - a. The training provider must submit documentation of the participant's expected graduation date on the letterhead. The beginning and ending dates must be included in the letter.
3. An ITA can be used to cover the costs of one training program per person. Exceptions will be determined on a case-by-case basis, by GMLWDB Executive Director in writing, primarily when a participant is attempting to earn stackable credentials within the same industry.
4. Certain classes of individuals (i.e., Veterans, recipients of public assistance and other low-income individuals) will receive priority for individualized career services and training services. *(Please refer to Priority of Service Policy).*

**V. Exceptions:**

The Executive Director may make exceptions to the requirements herein. Moreover, ITAs should comply with the applicable requirements and/or terms of any special grants issued by the Tennessee Department of Labor and Workforce Development (e.g., SNAP, RESEA).

**Inquiries:**

Please contact Amber Covington, Executive Director, [acovington@memphischamber.com](mailto:acovington@memphischamber.com), with any questions or concerns regarding this policy.



Desi Franklin  
Workforce Midsouth, Inc. Board

  
Adopted Date

GMLWDB is a proud partner of the American Job Center network, is an Equal Opportunity Employer. The Career Center System is an Employer/Equal Opportunity Program. Auxiliary aids and services are available upon request to individuals with disabilities.

TTY: 1-800-848-0299