

Revised – February 3, 2009

Individual Training Account (ITA) Policy

Revised ... **February 3, 2009**

Approved by the COWIB – August 15, 2007

PURPOSE: To establish a local ITA policy in conformance with: (i) Section 134(d)(4)(G) of the federal Workforce Investment Act, and (ii) ***Oklahoma Employment and Training Issuance #15-2008, “Individual Training Account Policy,” dated November 7, 2008.***

AUTHORITY: The authority for this policy derives from the Workforce Investment Act of 1998 (WIA) which provides that, with limited exceptions, WIA training services for Adults and Dislocated Workers will be provided through the use of Individual Training Accounts (ITA’s).

In addition, OETI #15-2008 permits Older and/or Out-of-School Youth to receive ITA’s pursuant to a waiver granted to the State of Oklahoma by the Secretary of Labor. The waiver creates an exception to the regulations given at 20 CFR § 664.510, and it is granted through June 30, 2009.

The WIA Final Regulations describe the authority of local workforce investment boards with respect to ITA’s. Here is an excerpt from the preamble to the Regulations:

*“...A key reform tenet of the Workforce Investment Act is that adults and dislocated workers who have been determined to need training may access training with an Individual Training Account which enables them to choose among available training providers, thus bringing market forces into federally funded training programs. Section 663.410 provides a definition for an ITA that seeks to provide maximum flexibility to State and local program operators in managing ITA's. **These regulations do not establish the procedures for making payments, restrictions on the duration or amounts, or policies regarding exceptions to the limits of the ITA, rather they provide that authority to the State or Local Boards.**”*

BACKGROUND: The definition of the term, “Individual Training Account” appears in Section 663.410 of the Final WIA Regulations:

“The ITA is established on behalf of a participant. WIA title I adult and dislocated workers purchase training services from eligible providers they select in consultation with the case manager. Payments from ITA's may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments may also be made incrementally; through payment of a portion of the costs at different points in the training course. (WIA sec. 134(d)(4)(G).)”

STATE & FEDERAL REQUIREMENTS: In developing a policy for handling grievances and complaints, the Central Oklahoma Workforce Investment Board and its service providers must be mindful of the requirements of its State and Federal funding sources.

Federal Policy: As noted above, the Federal Regulations at 20 CFR Part 663.410 describe the requirements of federal law that must be met by local workforce investment areas. Also, ITA requirements are described in Section 134(d)(4)(G) of the federal Workforce Investment Act.

State Policy: The Oklahoma Employment Security Commission addresses the ITA requirements of the Workforce Investment Act in OETI #15-2008.¹ This issuance describes the necessary elements of a local policy, including—

- Provisions governing the use of Individual Training Accounts;
- How ITA’s will be coordinated with other grant assistance; and
- Policies and payments with respect to payments made pursuant to an ITA.

LOCAL POLICY:

It shall be the policy of the Central Oklahoma Workforce Investment Board (COWIB) and its Board of Local Elected Officials (LEO) that all Workforce Investment Act Title I-funded services shall be delivered in a manner that fully complies with the WIA law and regulations.

Topics covered in this Policy include—

	<u>Page</u>
(1) Management of ITA’s	2
(2) Eligible Participants	3
(3) Funding of ITA’s	3
(4) Assessment, Counseling, and Individual Plan Development	4
(5) Training in Demand Occupations	4
(6) Customer Communications	5
(7) List of Eligible Training Providers	5
(8) Covered Training Costs	5
(9) Limits on the ITA	6
(10) Coordination with Pell Grants and Other Forms of Financial Aid	8
(11) Limited Exceptions to the use of ITA’s	12
(12) Consumer Choice	12
(13) Payments	14

(1) **Management of ITA’s.** As described in the WIA Regulations, Individual Training Accounts will be provided to eligible participants through the One-Stop Delivery System. In Central Oklahoma, ITA’s will be managed by the Central Oklahoma Workforce Investment Board

¹ A copy of this issuance can be found on the OESC’s website: <http://www.oesc.state.ok.us/WIP/OETI/oeti.shtm>.

Revised – February 3, 2009

in cooperation with:

- (a) The COWIB’s One-Stop Operator (for the delivery of training services to Adult and Dislocated Worker participants);² and
- (b) For Older and Out-of-School Youth, the entities selected by the COWIB to deliver the services of the WIA Youth Program.³

This policy provides sample forms which may be used by these Service Providers for the creation of ITA’s and the processing of payments. Please refer to **Attachments A, B, and C** of this policy statement for additional details on these forms, including the mandatory elements of each form that have been identified by OESC Policy.

(2) Eligible Participants. Participants who are eligible to receive assistance through an ITA include:

- (a) Eligible Adults;
- (b) Eligible Dislocated Workers, including those funded by National Emergency Grant funds; and
- (c) Older and Out-of-School Youth.⁴

NOTE: Consistent with the approved Two-Year Plan for the Central Oklahoma area, Occupational Skills Training provided through Individual Training Accounts shall be restricted to customers who reside within the geographical boundaries of the Central Oklahoma workforce investment area as defined by the Governor. Eligibility shall also be extended to eligible dislocated workers who have been laid off (or receive a notice of layoff) from an employer located in the Central Oklahoma workforce investment area.

An ITA may be used only to support the qualified training costs of the individual named on the account. ITA’s shall not be transferable. ITA’s shall not be established for training that is fully funded with TAA⁵ program funds.

(3) Funding of ITA’s. The Central Oklahoma Workforce Investment Board, acting as the fiscal agent for WIA Title I funds in the Central Oklahoma area, will make payments to eligible training providers based on properly prepared Individual Training Accounts and other payment mechanisms (vouchers, etc.), as allowed by 20 CFR 663.410.

The COWIB will establish appropriate payment methods, consistent with WIA financial management best practices. See Section (13) of this Policy.

² The process of awarding ITA’s to eligible customers will be treated as an integrated service of the Workforce Oklahoma centers in the Central Oklahoma area.

³ i.e., “Youth Providers.”

⁴ Individual Training Accounts may be used for Older Youth and Out-of-School Youth while the provisions of the waiver are in effect.

⁵ TAA = Trade Adjustment Assistance.

Revised – February 3, 2009

For Adults and Dislocated Workers, the COWIB shall use funds that have been awarded to the COWIB for this purpose.

For Older Youth and Out-of-School Youth, the COWIB may use available funds as allowable and appropriate:

- For an Older Youth or Out-of-School Youth who is eligible to receive concurrent services as an Adult or Dislocated Worker, funds from the WIA Adult program or Dislocated Worker program may be used to pay for the ITA as described in the WIA Regulations at 20 CFR 664.500.
- Alternatively, WIA Young Program funds may be used to finance the ITA.

The COWIB will coordinate the use of ITA's for co-enrolled (Adult / Older Youth) participants so as to ensure that payments to training providers are not duplicated.

For additional information on "Payments," see Section (13) of this Policy.

(4) Assessment, Counseling, and Individual Plan Development. Prior to approving an ITA for any eligible participant, the COWIB must ensure that a training plan has been established for each participant, consistent with State and local policies. At a minimum, the COWIB must verify that each participant has received assessment, counseling, and an individual employment plan or individual service strategy prior to selecting a training program.

For Adult and Dislocated Worker participants, the requirements of OETI #14-2005, Change 1, ("Policy for Assessment and Individual Employment Planning") must be met.

Additionally, the IEP must include documentation showing that the "sequencing" requirements of the WIA program have been met. These requirements are outlined in the following local policies:

- COWIB Policy on Sequencing of Services; and
- COWIB Policy on Employment Leading to Self-Sufficiency.

For Adult participants, there must be clear evidence that the COWIB's Priority Guidelines have been followed. For Older Youth and Out-of-School Youth, the participant must have an Individual Service Strategy meeting the requirements of the COWIB's Policy and Procedures on Youth Assessment and Individual Service Strategy (ISS).

For any participant who is referred to training – whether Adult, Dislocated Worker, or Youth -- the assessment must show that the individual is in need of training services and has the skills and qualifications to successfully complete the selected program of training.

(5) Training in Demand Occupations. The COWIB will verify that all ITA's are established to support training services that are directly linked to employment opportunities in the Central Oklahoma area or to employment opportunities in another area in which the individual receiving such services is willing to relocate. (Reference: WIA Section 134(d)(4)(A)(iii)).

Revised – February 3, 2009

Providing Information about the Demand Occupations List. Pursuant to the COWIB's Demand Occupations Policy, a list of Demand Occupations for the Central Oklahoma area has been established by the Board. It will be updated annually or more often. The Service Provider will establish procedures for assuring that WIA customers have access to the Demand Occupation list.

The COWIB's List of Demand Occupations may be found on the internet here:
www.cowib.org

(6) Customer Communications. The COWIB will assure that each Service Provider (that is, Youth Provider or One-Stop Operator) has established procedures for communicating to its customers, in clear, understandable terms, information about the ITA training services process.

(7) List of Eligible Training Providers. As described in OETI #04-2005 ("Eligible Training Provider Program," March 31, 2005), ITA's may be used to pay for training services provided by Eligible Training Providers. Eligible Training Providers are identified by the State of Oklahoma in cooperation with local workforce investment boards.

The Oklahoma Employment Security Commission has created an online "State List" of WIA eligible training providers. *The website may be accessed at www.oklahomajoblink.com.*

Each Service Provider will establish procedures for making available the State List to its customers. Consistent with the "customer choice" principle of the Workforce Investment Act, WIA customers must be given access to the complete list of eligible training providers, without exception. See Section (12) of this Policy.

(8) Covered Training Costs. Pursuant to OETI #15-2008, each ITA shall cover ONLY those actual and necessary training costs required by the institution/school for completion of the training program:

"The ITA must be established only for the training and training-related costs specifically required by the eligible training provider for the approved program and paid to the eligible training provider. Because eligible training providers are the only entities that can receive ITA payments, if there are any training-related costs not available through the eligible training provider those cost must be provided as a supportive service in accordance with local WIB's supportive service policy and procurement policy not paid out of the ITA.

- *Books, uniforms, tools, etc. purchased from the training provider are training-related costs and paid to the eligible training provider from the ITA Voucher.*
- *Books, uniforms, tools, etc. purchased from a vendor are a supportive service cost."*

The cost of training may include tuition, fees, books, and other educational materials and services (supplies, student housing, etc.) when those training related costs are required by the eligible training provider and paid to the eligible training provider.

Revised – February 3, 2009

If a training related expense is *not* required by and paid to the eligible training provider, then an ITA may *not* be used to pay for it. Rather, in such cases, the expense may be covered as a Supportive Service if allowed in the COWIB’s Supportive Services Policy.

(9) Limits on the ITA. The WIA Regulations at 20 CFR 663.420 provide that the duration and amount of ITA’s may be limited by local board policy.

Sec. 663.420 Can the duration and amount of ITA's be limited?

(a) Yes, the State or Local Board may impose limits on ITA's, such as limitations on the dollar amount and/or duration.

(b) Limits to ITA's may be established in different ways:

(1) There may be a limit for an individual participant that is based on the needs identified in the individual employment plan; or

(2) There may be a policy decision by the State Board or Local Board to establish a range of amounts and/or a maximum amount applicable to all ITA's.

(c) Limitations established by State or Local Board policies must be described in the State or Local Plan, respectively, but should not be implemented in a manner that undermines the Act's requirement that training services are provided in a manner that maximizes customer choice in the selection of an eligible training provider. ITA limitations may provide for exceptions to the limitations in individual cases.

(d) An individual may select training that costs more than the maximum amount available for ITAs under a State or local policy when other sources of funds are available to supplement the ITA. These other sources may include: Pell Grants; scholarships; severance pay; and other sources.

(a) Overall Maximum Amount / Duration. Consistent with the guidance provided in 20 CFR 663.420, the COWIB has established the following overall limits, as described in our Two-Year Plan:

(i) Limit on the Duration of the ITA. Each ITA shall be time-limited. The ITA may be used to pay for training that does not exceed 24 months (or 104 weeks) of ~~actual~~ training time, measured from the date of the first week of training to the date of the last week of training. ~~not including breaks between semesters or courses.~~

(ii) Limit on the Amount of the ITA. The amount of expenses paid through an ITA shall not exceed \$10,000 for any student, and it is expected that no more than \$5,000 in expenses ~~may~~ will be paid in any 12-month period.

(b) Lower Maximums for Varying Occupations. Within the overall maximum amount / duration limits described above, and consistent with the guidance provided in 20 CFR 663.420, the COWIB may authorize its Chief Executive Officer to establish a range of training duration / cost maximums for specific types of occupational skills training, based on one or more of the following considerations:

- The vocational preparation time required for the specific occupation.
- Whether or not the training is related to a “STEM” occupation – that is, an

Revised – February 3, 2009

occupation in the field of Science, Technology, Engineering, or Mathematics (as defined by the O*Net Occupational Information Network).⁶

- The degree to which the specific occupational area is associated with Targeted Industries in the Central Oklahoma area.

(c) Individual Participant Limits. Within the maximum amounts and range limits established in paragraph (a), the COWIB, in cooperation with its Service Providers, shall establish procedures for making necessary and reasonable payments to cover the needs of the participant as identified in the individual employment plan or individual service strategy. ITA limits for an individual participant may be established based on the needs identified in the participant's IEP or ISS.

The COWIB shall establish necessary and reasonable procedures for closing an ITA whenever a customer fails to maintain satisfactory progress in his / her program of training.

(d) Exceptions. Exceptions to the limitations in this policy may be made in individual cases under the following circumstances:

- Individual Hardship – unanticipated life circumstances that have a negative effect on the ability of the participant to complete his/her program of training within the planned timeframe; or
- Other Circumstances Beyond the Control of the Participant – For example, unanticipated costs or extension of time required to complete the approved program of training.

In the event of an Individual Hardship, an ITA may be modified to exceed the limits established in paragraph (a). To be valid, an “Individual Hardship” exception must be approved in writing by the COWIB’s Chief Executive Officer or Program Operations Manager. Examples of unanticipated life circumstances that may qualify for an Individual Hardship exception include:

- A long-term illness suffered by the participant or a family member;
- Frequent minor illnesses requiring the participant to miss more than one session of training;
- A problem with alcohol or drugs that interferes with attendance in the training program;
- Incarceration of the participant or a family member;
- Difficulty finding adequate housing;
- Difficulty recovering from a crime;
- Difficulty caused by sexual, emotional, or physical abuse;
- Etc.

In the event of Other Circumstances Beyond the Control of the Participant, an ITA may be modified to exceed the limits established in paragraph (a). To be valid, an “Other

⁶ Reference: <http://online.onetcenter.org/find/stem?t=0&g=Go>.

Revised – February 3, 2009

Circumstances” exception must be approved in writing by the COWIB’s Chief Executive Officer or Program Operations Manager. Examples of Other Circumstances that may qualify for an exception include:

- An unexpected extension of the duration of the training program by the training provider;
- An unanticipated increase in the cost of tuition, fees, or the cost of books, etc.;
- An unexpected cancellation or closing or delay of a required class, session, internship opportunity, or other required element of the training program;
- Etc.

When an exception has been granted, the amount of the individual’s ITA may be increased by a necessary and reasonable amount *not to exceed* 50% of the original value of the ITA (up to an additional \$5,000). The duration of the individual’s ITA may be extended by a length of time *not to exceed* 50% of the original training plan (i.e., up to an additional 12 months).

(e) Fairness. As always, the COWIB will make every effort to serve individual participants in a manner that is fair and impartial. The COWIB and its service providers recognize our responsibility to deliver our services in a non-discriminatory fashion. In establishing individual participant limits relative to ITA’s, we will assure that all participants are treated equitably – without regard to the individual’s race, color, religion, sex, national origin, age, disability, political affiliation or belief. Furthermore, we will not discriminate on the basis of the participant’s citizenship or status as a lawfully admitted immigrant authorized to work in the United States. And, we will offer equitable services to all customers regardless of the individual’s participation in any WIA Title I-financially assisted program or activity.

Simultaneously, we will make every effort to enforce the COWIB Policy on Priority of Service for Participants in the WIA Adult Program. In a similar fashion, we will implement the State Policy on Veterans’ Priority in DOL Funded Workforce Programs (OETI #15-2004). Customer service decisions will always be compliant with WIA law and regulations.

(f) Training that Exceeds the ITA Limits. If the cost or duration of training for an individual participant exceeds the limits described in this policy, other sources of funds may be used to make up the difference. These other sources may include: Pell Grants; scholarships; severance pay; and other sources. (See Part (10) of this Policy, below).

(10) Coordination with Pell Grants and Other Forms of Financial Aid. The COWIB and its Service Providers shall operate under the general requirement to deliver services that are “necessary and reasonable.” In determining whether it is “necessary” to provide WIA assistance to an individual customer, the Service Provider staff must consider whether other non-WIA resources are available to meet the customer’s needs. In particular, the Service Provider must pay attention to the requirement described in Section 134(d)(4)(B)(i) of the WIA law:

“REQUIREMENT. – ... *Provision of such training services shall be limited to individuals who—*

Revised – February 3, 2009

- “(I) are unable to obtain other grant assistance for such services, including Federal Pell Grants established under title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.); or*
- “(II) require assistance beyond the assistance made available under other grant assistance programs, including Federal Pell Grants.”*

To fulfill these requirements, COWIB Service Providers are instructed to utilize the “Coordination of Training Funds” form that is given in **Attachment C** of this policy statement.

The Coordination of Training Funds (COTF) form is a fundamental tool for assuring compliance with Section 134(d)(4)(B)(i) of the Workforce Investment Act. It provides a standard method for determining the unmet needs of WIA-supported students. The COTF form is helpful in establishing the cash value of WIA assistance that may be given to a participant – whether the assistance is provided through an ITA or through a supportive service payment.

As stated in OETI #15-2008:

WIA service providers and eligible training providers must consider the availability of Pell Grants and all other available sources of financial assistance, including other Federal programs but excluding loans, in determining an individual’s overall need for WIA funds to pay for allowable training costs. This is intended to ensure that WIA funds supplement other sources of training grants. To avoid duplicate payment of costs when an individual is eligible for both WIA and other assistance, WIA service providers and eligible training providers must coordinate by entering into arrangements with the entities administering alternate sources of funds, including eligible training providers administering Pell Grants [20 CFR Part 663 §663.320 (a) and (b)]. All financial resources, excluding loans but including WIA funds (training, training-related, and supportive service funds) cannot exceed the total cost of attendance as indicated on this form.

*All WIA service providers will use the Coordination of Training Funds form... to provide documentation of the coordination between the WIA service provider, entities administering alternate sources of funds, and eligible training providers. Section III of the Coordination of Training Funds form must be completed by a financial aid officer (or those personnel who perform those duties) before WIA training is approved. The Coordination of Training Funds form section III **cannot be altered** by WIA Service Providers. WIA Service Provider will complete section IV of the Coordination of Training Funds form, certifying that funds are not available or are inadequate from other alternate sources of funding, these funds listed in section IV will need to be subtracted from the unmet financial need determined by the Financial Aid Officer in section III to arrive at the adjusted unmet financial need.*

(a) Rules for Use of the Coordination of Training Funds Form.

- (i) A new Coordination of Training Funds form is required for each designated period of training. The training institution may do this per semester, annually, or by billing cycle for the type of training institution and the type of training they are providing.
- (ii) WIA service providers, entities administering alternate sources of funds, and eligible training providers are responsible for ensuring and so documenting that

Revised – February 3, 2009

tuition-specific awards from all other sources have been applied to the tuition/fees costs first. This comprehensive coordination of available funds by WIA service providers and eligible training providers must make sure there is no duplication of payments.

(iii) The exact mix of funds should be determined based on availability of funding for either training costs or supportive services, with the goal of ensuring costs of the training program the participant selects are fully paid and that necessary supportive services are available so that the training can be completed successfully. This determination should focus on the needs of the participant. There are three caveats:

- A. WIA funds for training services are limited to instances when there is no or inadequate financial assistance from other sources;
- B. Participation in a training program funded under WIA may not be conditioned on applying for or using a loan to help finance training costs.
- C. Duplicate payments of costs when an individual is eligible for both WIA and other assistance (including Pell grants) must be avoided.

(b) Special Rules for Coordination with Pell Grants.

(i) The COWIB's One-Stop Operator will be responsible for establishing procedures so participants will be assisted early in the assessment process, as appropriate, to establish eligibility for Higher Education Act Title IV funds (e.g., Pell Grants) and other forms of financial aid. This includes providing participants with appropriate application forms and any needed assistance in completing and submitting them. These application forms are accessible online at www.FAFSA.ed.gov.

(ii) WIA Assistance While a Pell Grant Application is Pending. WIA §134(d)(4)(B)(ii) permits a WIA participant to enroll in an eligible training program with WIA funds while an application for Pell Grant funds is pending. However, pursuant to 20 CFR Part 663 §663.320(c), the WIA service provider must make prior arrangements with the eligible training provider and the WIA participant regarding allocation of the Pell Grant, if it is subsequently awarded. If the Pell Grant is awarded, the local WIA service provider must be reimbursed for WIA funds previously used to underwrite training for the amount the Pell Grant covers. This is to ensure non-duplication of payments. Pursuant to clarification found in the preamble to 20 CFR Part 663, since Pell Grants are intended to provide for both tuition and other education-related costs, *only the portion specifically provided for tuition is subject to reimbursement*. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIA participant for education-related expenses.

Therefore, the exact mix of all available funding (including Pell Grants and WIA program resources) should be constructed with the goal of ensuring that the costs of the approved training program the participant selects are fully paid without duplication and that necessary supportive services are available so the training may be

Revised – February 3, 2009

completed successfully. WIA service providers are responsible for ensuring duplicate payments for training program costs are not made with WIA funds.

(c) Special Rules for Coordination with Non-Pell Eligible Training Providers. Non-Pell eligible Training Providers do not calculate the unmet need in the same manner as Pell Eligible Training Providers. In the event the Coordination of Training Funds form section III indicates that the Training Provider is not Pell eligible and the unmet financial need determined by the Financial Aid officer equals the cost of attendance, [COWIB] may authorize supportive service payment(s) in excess of the unmet financial need which would allow participation in WIA Occupational Skills Training.⁷

Local Guidelines:

1. ~~Each COWIB Service Provider~~ **The COWIB's One-Stop Operator** should establish positive, pro-active working relationships with each Eligible Training Provider in the Central Oklahoma area. Proper coordination between the WIA Service Provider and the state-approved Eligible Training Provider is necessary in order to fulfill the requirements of this policy.
2. To be operationally effective, this coordination should involve—
 - ✓ The Skills Development Unit within each One-Stop Center location;
 - ✓ WIA Youth Program case managers / career counselors (if applicable); and
 - ✓ The financial aid office of each state-approved Eligible Training Provider.
3. To the extent practicable, each COWIB Service Provider should develop necessary processes and protocols to ensure that, prior to training enrollment—
 - ✓ Available Federal, State, local and personal resources⁸ are coordinated sufficiently to meet the training and education-related costs of services without duplication of payments, so the participant can afford to complete the agreed-upon program successfully while not receiving funds in excess of identified allowable costs.
 - ✓ These processes and protocols must include a process for documenting how sources of funds other than WIA grant funds were sought first (e.g., Pell Grants, Oklahoma Higher Access Learning Program (OHLAP), Trade Adjustment Assistance, one-stop programs other than WIA, etc.).
4. Service Providers should maintain a methodology to—
 - ✓ Document the participant's training-related financial assistance needs; and
 - ✓ Record those needs and the mix of funding assistance in the participant's record.

⁷ Find additional guidance in the COWIB's Supportive Services Policy.

⁸ Pursuant to OETI 15-2008, "personal resources" may include wages earned by the participant through employment while attending training.

Revised – February 3, 2009

5. Consistent with Privacy laws and regulations, each COWIB Service Provider shall maintain forms and procedures necessary to facilitate the sharing of participant financial aid information between the Service Provider and the financial aid office of the Eligible Training Provider.
6. Each ITA payment mechanism shall contain written terms / conditions—
 - ✓ Establishing safeguards to ensure that WIA (and other One-Stop Partners’) funds are used in addition to funds otherwise available, and are coordinated with those funds.
 - ✓ Stating that a participant is never required to apply for or access a student loan or incur personal debt as a condition of participation.⁹

(11) Limited Exceptions to the use of ITA’s. Consistent with the WIA law and regulations, contracts for services may be used instead of ITA’s when one of the following exceptions applies:

- When the services provided are on-the-job training (OJT) or customized training;
- When the COWIB has designated a “program of demonstrated effectiveness” as defined in WIA Section 134(d)(4)(G)(iv);¹⁰ or
- When the participant is an Older Youth or Out-of-School Youth and the Service Provider chooses not to use an ITA mechanism to pay for occupational skills training.

(12) Consumer Choice. Training services, whether accessed by establishment of ITA’s and the providing of vouchers or contracted arrangements, must be provided in a manner which maximizes informed customer choice in selecting an eligible training services provider in accordance with the goals and objectives outlined in the client’s Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

The exact requirement of the law appears in Section 134(d)(4)(F)(i) of the Workforce Investment Act:

“(F) Consumer choice requirements.--

“(i) In general. -- Training services provided under this paragraph shall be provided in a manner that maximizes consumer choice in the selection of an eligible provider of such services.”

Therefore, with the following exceptions, the COWIB’s Service Providers must make available to customers the complete list of eligible training providers that is described in Part (7) of this policy:

- Exception 1: Out of State Training. Customers may not use an ITA to access training at an out-of-state training provider location without prior written approval by the COWIB’s CEO.

⁹ Pursuant to OETI #15-2008, a participant “...may incur personal debt when agreed to and after counseling regarding the responsibilities associated with the indebtedness, including loan repayment. Such counseling must be acknowledged in the participant’s record.”

¹⁰ NOTE: As of the date of publication of this policy, the COWIB has not designated any such programs.

Revised – February 3, 2009

- Exception 2: Out of Area Training. Service Providers may limit the customer's choice to those Eligible Training Providers which are located within a reasonable distance of the Central Oklahoma workforce investment area. This exception is made in order to manage the extra costs of coordination and oversight that are often attendant to training services offered outside of the Central Oklahoma area. ~~Each of the COWIB's Service Providers is authorized to establish its own~~ The COWIB's Chief Executive Officer will establish parameters with respect to training offered within the State of Oklahoma but outside of the Central Oklahoma workforce investment area.
- Exception 3: Customer's Skills and Qualifications. Section 134(d)(4)(A)(ii) of the Workforce Investment Act provides that WIA training funds may be used to support the training costs of an eligible participant only after a determination has been made affirming that the participant has the skills and qualifications to successfully participate in the selected program of training services. The determination must be based on an individual assessment that is compliant with the COWIB Policy on Assessment and IEP's (or, for Youth, the COWIB's Policy on Youth Assessment and Individual Service Strategy (ISS)). Therefore, the customer's choice of training providers may be restricted to those programs for which the participant has the necessary skills and qualifications to succeed.

With regard to Exception 3, the COWIB acknowledges Part 663.410 of the WIA Final Regulations, which describes how Individual Training Accounts are designed to enable eligible WIA participants to "...purchase training services from eligible providers they select *in consultation with* the case manager." (Emphasis added).

The consultative role of the case manager is a central consideration in the COWIB's resolve to provide access to training services for eligible participants in a manner which maximizes informed customer choice.

The COWIB interprets Part 663.410 to mean that the individual participant has the authority to select the eligible training provider that s/he prefers, provided that other requirements of this policy have been satisfied. In particular:

- The participant must meet the general eligibility / priority requirements for the establishment of an Individual Training Account.
- The participant must have participated in an assessment and evaluation process, culminating with the development of an IEP or ISS.
- The participant must have received the benefit of advice, consultation and guidance from a Workforce Oklahoma case manager.
- The participant's choice of training program must not violate any of the policy exceptions described above.

If each of these requirements has been satisfied, then the participant shall have the option of choosing the eligible training provider that s/he prefers.

Within this context, any attempt by a COWIB Service Provider to arbitrarily limit a customer's choice will be considered a violation of this policy. This would include withholding information

Revised – February 3, 2009

about an eligible training provider or intentionally steering a customer toward – or away from – a state-approved eligible training provider within the Central Oklahoma area.

When considering whether a participant has the skills and qualifications to successfully participate in a selected program of training services, each COWIB Service Provider must rely on objective criteria applied equally to all participants.

(13) Payments. Pursuant to OETI #15-2008:

“ITAs are established on behalf of participants who then purchase training services from eligible providers they select in consultation with a WIA service provider. Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments may also be made incrementally, through payment of a portion of the costs at different points in the training course. [WIA §134(d)(4)(G) and 20 CFR Part 663 §663.410]”

In the Central Oklahoma area, the Central Oklahoma Workforce Investment Board will make payments to eligible training providers as described in this policy. In general, payments will be made according to the following sequence of steps:

- ✓ **Creation of an approved Individual Training Account.** The ITA will establish the maximum amount of funds which may be paid to the eligible training provider on behalf of the individual participant. The amount will reflect the total expected costs (tuition, fees, books, etc.) that will be paid through the ITA mechanism during the training period.
- ✓ **Creation of approved Training Voucher.** With limited exceptions, the COWIB will make incremental payments to the eligible training provider at discrete payment points in the program of training (e.g., on a semester basis). For each payment, a Training Voucher will be created. This process will serve to verify that the individual participant is prepared to proceed with training. It will also serve as an advance notice to the COWIB that funds should be properly reserved for a payment to the training provider.
- ✓ **Receipt of Invoice from the Training Provider.** Upon receiving a properly-prepared invoice from an eligible training provider, the COWIB will make a payment according to established procedures.

(a) Written Procedures. The COWIB will establish written procedures for endorsing and facilitating access to training services. The procedures will describe:

- (i) The method that will be used for the disbursement of funds to eligible training providers.
- (ii) How ITA expenditures will be documented. (See part (b), below).
- (iii) A process for tracking WIA Title I expenditures paying for the individual’s training, training-related, and supportive service cost.
- (iv) A process for tracking total local area ITA obligations to ensure that the COWIB’s budget is not exceeded.

Revised – February 3, 2009

(b) Documentation. Pursuant to OETI #15-2008, the COWIB’s written procedures will include a process to collect and maintain requirement documentation in order to validate that each expenditure through an ITA mechanism is “appropriate.” Documentation elements include:

- (i) A copy of the voucher, purchase order, invoice, source documentation, receipts, etc. that will support the payment mechanism.
- (ii) A tracking document (e.g., spreadsheet, report, etc.) to ensure local established funding limits have not been exceeded.
- (iii) A tracking document to ensure that training, training-related, and supportive service dollars do not exceed the unmet financial need for the corresponding period of training as determined by the financial aid officer (or those personnel who perform those duties) based on the Coordination of Training Funds form.

POLICY ADDENDA: The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, forms, etc., to further implement the requirements of this policy. Inquiries about this policy should be directed to the COWIB’s Program Operations Manager at (405) 622-2030.

Attachments:

- (A) Individual Training Account form and Training Enrollment Agreement;
- (B) Individual Training Voucher / Modification form;
- (C) Coordination of Training Funds form;
- (D) Policy Clarifications: Questions & Answers

Revised – February 3, 2009

**COWIB Individual Training Account Policy
Attachment (A)**

Attachment A

- ITA Form;
- Training Enrollment Agreement.

These forms are presented of examples of allowable forms that may be used to implement the Individual Training Account Policy.

The COWIB, in coordination with its Service Providers, will develop specific forms for the purpose of administering payments based on each customer's approved ITA. Questions may be directed to the COWIB's Program Operations Manager at 622-2030.



Central Oklahoma Workforce Investment Area
Individual Training Account



ITA #: _____
 (To be assigned by COWIB)

Pursuant to the terms of the Training Enrollment Agreement and the Workforce Investment Act, the Central Oklahoma Workforce Investment Board agrees to provide funding for the following training—

Customer: _____

Participant Number: _____ Funding Source: _____

Training Program(s): _____

Training Provider: _____

Training Period: _____ to _____ Total: \$ _____

Training Period: _____ to _____ Total: \$ _____

Total Training Period: _____ to _____

Total Funds: \$ _____

Total Funds may include tuition, fees, books, and other educational materials (supplies, etc.) required for the Program / Course of Study described above. Except as provided in State Policy, an ITA may not be used to pay for a student's cost of living or supportive services.

Requested by:

 Workforce Specialist (Approval)

 Date

 Customer

 Date

COWIB Approval:	
_____ <i>Signature</i>	_____ <i>Date</i>

Revised – February 3, 2009

Training Enrollment Agreement

Name: _____

ID Number: _____

The Central Oklahoma Workforce Investment Board provides training opportunities to eligible participants under the Workforce Investment Act (WIA). It is our desire that you gain from this opportunity by increasing your ability to find and retain meaningful career employment. Since this is not an entitlement program, we ask that you follow certain guidelines that are designed to maximize your training experience while ensuring that we maintain the integrity of the program funds. Your case manager will explain this document. Please keep it for reference.

RECOGNIZING THAT I HAVE BEEN ACCEPTED / SPONSORED FOR TRAINING, I HEREBY ACKNOWLEDGE AND AGREE TO THE FOLLOWING:

- a. The services I am to receive are considered an investment in my future, I have an obligation to myself and to the taxpayers to ensure that I use this opportunity wisely and efficiently. I will devote my time and energy toward successfully completing training and obtaining employment in the training field I have chosen.
- b. The amount of my ITA has been awarded based on individual factors including cost of attendance, coordination of other funding sources, and needs identified in my individual plan of service.
- c. Sponsorship for training is for a specified period of time. I understand that training funds for this project will not be available after _____. (Month / Day / Year). I understand that continued sponsorship is dependent upon:
 - (1) Continued availability of funds;
 - (2) Meeting the attendance and academic requirements of my school / training provider.
 - (3) Compliance with program policy and procedures; and
 - (4) Compliance with, or modification of, my individual plan of service as jointly developed by my case manager and myself.
- d. The goal of training is for me to seek and accept full-time employment upon completion of training. This is my goal also. I will do my best to find and accept employment upon completion of training. I will seek and accept help from any source that I feel can assist me in finding employment. My case manager has made me aware of services available to me through program sponsorship, Workforce Oklahoma, the school I will attend, and other agencies whose services have been identified to help meet my needs during the training process.
- e. The amount in my Individual Training Account is \$ _____. I recognize that this amount is / may be (circle one) the full amount / a part of my total financial budget (circle one) available to me for training, and it is my responsibility to budget and track my training expenditures to ensure that the funds available to me are not depleted prior to completion of training. I will coordinate with my case manager and verify my Individual Training Account (ITA) balance as necessary.
- f. By accepting sponsorship, I am obligated to meet certain requirements. By meeting these requirements, I will earn the privilege of continued sponsorship, subject to continued availability of Department of Labor funding. These requirements are:
 - i. I agree to frequent contact with my case manager to discuss my training progress and any other issues, whether academic, personal, or financial that would affect my completion of training. Since I am ultimately responsible for my own actions concerning the success or failure in this program, I understand that my case manager is available to assist me in overcoming any problem areas which would keep me from realizing my goals. I will schedule a meeting with my case manager to discuss my training progress as necessary.
 - ii. As appropriate to my training choice, I will coordinate registration activities with my case manager prior to registration for the term or course. In addition, I will consider the advantages of using early registration, if possible, to enroll for all following terms to ensure that I get the courses I need to continue the training. I will provide information concerning my registration and book costs to my case manager for fiscal purposes.
 - iii. Prior to the beginning of each new semester I will schedule an appointment with my case manager to complete a voucher for the upcoming semester. I agree to provide any documentation necessary for completion of the voucher, which may include class schedule, enrollment sheet, grade report from previous semester, and Financial Aid Award letter.
 - iv. For purposes of counseling and progress adjustment/assessment, I will provide my grade report to my case manager within two weeks after the close of each term, or make arrangements for my school to provide the information.
 - v. I will immediately inform my case manager of changes of name, address, phone number, or back-up contact information.

Revised – February 3, 2009

- g. I also understand the following guidelines concerning my training:
 - i. I am aware of financial assistance available to me through my occupation training enrollment, and I agree to make application for such assistance through FAFSA, and I am aware that funds obtained through all other sources must be applied before funds provided by the Workforce Investment Act.
 - ii. I understand that I am not required to access student loans or incur personal debt as a condition of participation. However, if I choose to do so, I understand the responsibilities associated with such indebtedness, including loan repayment. My case manager has counseled me in regard to this issue.
 - iii. I will complete my training program as quickly as possible. I understand that regular class attendance is necessary, as all training must be completed on or before: _____. (Date)
 - iv. I understand the impact of remediation classes on my overall training program and the time limits associated with WIA sponsorship.
 - v. If I feel that a training course other than those directly related to my training/degree plan is needed, I will discuss this matter with my case manager prior to registration, and I will consult my case manager on any class substitutions granted by the school. I recognize that I will not be authorized additional funding to cover such decisions.
 - vi. **I will not add or drop a class without first consulting with my case manager.**
 - vii. If I am experiencing difficulty with a class that is necessary for completion of my training, I will seek out tutoring or remediation services with the assistance of my case manager.
 - viii. The ITA shall cover ONLY those training costs required by the institution/school to complete the training program. I understand that ITA funding may be used to assist with tuition and fees as well as books, uniforms, tools, equipment or supplies required for training / degree plan.
- h. I recognize that no additional funding will be added to my ITA after I have expended my total budgeted training funding.
 - i. All WIA sponsored customers do not receive the same services. Because of this, I agree not to discuss the specific monetary award I am receiving with anyone other than my case manager and/or appropriate financial staff.
 - j. I am aware of training available for which there is a demand in the area served by this program, or in an area where I am willing to relocate upon completion of training. I have been informed that the training program I have chosen is directly linked to occupation(s) which is/are considered to be in demand in the Central Oklahoma workforce investment area.
 - k. I have reviewed the Eligible Training Provider list and have freely chosen _____ as my training provider.
 - l. I understand that violation of training institution or WIA guidelines can result in termination of sponsorship.
 - m. I understand that, concurrent with my training, I may choose to utilize Workforce Oklahoma services where I will be given detailed assistance in preparing for and obtaining employment in the field for which I am being trained.
 - n. Upon completion of training, I agree to provide my case manager with information concerning my employment and copies of any diplomas, credentials, or licenses earned. I will keep in contact with my Case Manager, and I will provide my case manager information concerning my current address, and phone number for one (1) year after training completion. I understand that my case manager will maintain contact with me for this time period after I complete training. As a part of this follow-up period, I agree to quickly respond to the Central Oklahoma Workforce Investment Board regarding any request for information concerning my program participation or employment.
 - o. My employment goal is:

I have read this document and hereby understand and agree to comply with the terms herein described. I am receiving a copy of this agreement for my records.

WIA Customer Signature

Date

I have established this ITA and reviewed the terms of this Agreement with the participant.

WIA Staff Signature

Date

Revised – February 3, 2009

**COWIB Individual Training Account Policy
Attachment (B)**

Attachment B

- **Individual Training Voucher Form;**
- **Individual Training Voucher Modification Form.**

These forms are presented of examples of allowable forms that may be used to implement the Individual Training Account Policy.

These forms may be modified to meet local requirements. However, the form used must include at a minimum the following:

- **Funding stream;**
- **Amount paid by category;**
- **Total number of hours;**
- **Participant’s signature and date;**
- **WIA Service Provider’s signature and date.**

The COWIB, in coordination with its Service Providers, will develop specific forms for the purpose of administering payments based on each customer’s approved ITA. Questions may be directed to the COWIB’s Program Operations Manager at 622-2030.

**Revised – February 3, 2009
Individual Training Voucher Form**



Eligible Training Provider: _____

Vendor Number: _____ Fund: _____

Participant: _____ ID Number: _____

WIA Program

Adult Dislocated Worker Youth Other _____

The Central Oklahoma Workforce Investment Board has agreed to sponsor the above named participant in the course(s) or program listed below and pay the training costs listed (based on off-the-shelf catalog prices) for the time period of _____ through _____. Refunds or returns for non-completion of training will be made to:

**Central Oklahoma Workforce Investment Board
3813 N. Santa Fe, Suite 135
Oklahoma City, OK 73118
www.cowib.org**

Training

Course No.	Program / Course Title	Hours

Authorized Training Costs

Item	Amount	Item	Amount
Tuition	\$	Equipment/Tools	\$
Fees	\$	Uniforms	\$
Books	\$	Other	\$
Total			\$

As a recipient of WIA Program assistance with tuition, fees, books, or required supplies, I hereby authorize the Eligible Training Provider listed above to release information concerning my attendance, grades and schedules to _____ (COWIB Service Provider).

Participant's Signature

COWIB Service Provider

Date

Date

COWIB Approval:	
_____ <i>Signature</i>	_____ <i>Date</i>

Revised – February 3, 2009
Individual Training Voucher Form
Instructions

1. Eligible Training Provider – Enter the name of the training service provider.
2. Vendor Number – This number will be assigned by the COWIB’s Accounting Manager.
3. Fund – For COWIB use: Enter N/A if not applicable.
4. Participant – Enter the participant’s name exactly as it appears in the OSL Record.
5. ID Number – Enter the number associated with the participant’s record in Oklahoma ServiceLink (OSL).
6. WIA Program – Mark **ALL** of the appropriate WIA program/funding sources for which costs are charged (tuition, books, etc.) for this referral.
7. Time Period – Enter the beginning and ending period for which costs may be incurred under this referral.
8. Course Number – Enter the program or course number exactly as published in the eligible training provider’s catalog or supplemental publication.
9. Program / Course Title – Enter the program or course title exactly as published in the eligible training provider’s catalog or supplemental publication.
10. Hours – Enter the hours (credit or actual) exactly as published in the eligible training provider’s catalog or supplemental publication.
11. Authorized Training Costs – Enter tuition and fee costs exactly as published in the eligible training provider’s catalog or supplemental publication. Enter actual or estimated costs for books, equipment/tools, uniforms and other costs as appropriate. Cost of books, equipment/tools, uniforms, and other costs may vary: therefore, a “maximum” should be used. **A modification is not required for these items if the cost is lower than the maximum estimate cost shown here.** Enter N/A if not applicable.
12. Total – Enter the total sum of all authorized training costs.
13. COWIB Approval – The voucher is not valid until it has been signed by an authorized representative of the Central Oklahoma Workforce Investment Board.

NOTE: The Service Provider may enter “See Attached” in the course number, title, and hours section if the institution enrollment form is attached for the participant.

Revised – February 3, 2009

**Individual Training Voucher Modification Form
Instructions**

1. Modification Number – Enter the number of the modification. 1,2, etc.
2. Effective Date – Enter the effective date of the modification.
3. Training Provider – Enter the name of the eligible training provider.
4. Vendor Number – Enter the vendor number as assigned by the COWIB, if any.
5. WIA Program – Enter the program title as identified on the original “Individual Training Voucher Form.”
6. Participant Name – Enter the name of the participant.
7. ID Number – Enter the number associated with the participant’s record in Oklahoma ServiceLink (OSL).
8. Explanation for Modification – Identify the reason or need for a modification of the “Individual Training Voucher.” Be specific.
9. Check Those That Apply – Identify each of the areas being modified and the dollar amount to be modified. All decreases shall be identified as follows: <\$0.00>. A modification is not required if the costs of books, equipment/tools, uniforms and other costs are lower than the maximum estimate which was stated on the Individual Training Voucher Form.
10. Total Amount of Modification – Enter the total dollar amount of the modification and check the box indicating an increase or decrease.
11. Supporting Documentation Attached – Check the appropriate answer. All modifications increasing the training cost shall have documentation attached. Modifications for deobligation or a decrease of training funds may not require supporting documentation.
12. COWIB Approval -- The voucher modification is not valid until it has been signed by an authorized representative of the Central Oklahoma Workforce Investment Board.

Revised – February 3, 2009

**COWIB Individual Training Account Policy
Attachment (C)**

Attachment C

Coordination of Training Funds Form.

This form is standard and must be used by all WIA service providers – it cannot be modified.

- Section I – to be completed by WIA Service Provider.
- Section II – to be completed by WIA Participant.
- Section III – to be completed by Financial Aid Officer.
- Section IV – to be completed by WIA Service Provider (If it is determined that there are other alternate sources of funding, these funds listed in section IV will need to be subtracted from the unmet financial need determined by the Financial Aid Officer in section III to arrive at the adjusted unmet financial need).

Questions may be directed to the COWIB's Program Operations Manager at 622-2030.

COORDINATION OF TRAINING FUNDS

SECTION I

To: FROM: SCHOOL: ATTENTION: ADDRESS: ADDRESS:

SECTION II

Participant Name: ID Number:

I hereby authorize the exchange of information between the WIA Case Manager and the Financial Aid Office at the above named School regarding the awarding of any financial aid from any source.

Participant's Signature Date

SECTION III (The following section is to be completed by the financial aid office)

COST OF ATTENDANCE

STUDENT'S FINANCIAL AID

Tuition \$ Fees \$ Supplies \$ Books \$ Tools \$ Uniforms \$ Other (Please Specify) \$

PELL Grant Eligibility \$ was not eligible due to income was not eligible due to default Training Provider is not PELL eligible OTAG \$ OLAP \$ SEOG \$ Tribal/BIA \$ R.O.T.C. \$ Tuition Waiver \$ Vocational Rehabilitation \$ Scholarship(s) \$ VA/Military \$ Other (Please do not include loans) \$

PERIODS COVERED:

- Fall Spring Summer Trimester I Trimester II Trimester III Full Length of Short Course

Cost of Attendance \$ minus Student's Financial Aid \$ equals unmet financial need \$

By signing below, the financial aid officer (or those personnel who perform those duties) agrees to inform the local WIA service provider of the amounts and disposition of financial aid to each participant awarded after the enrollment of the participant, as part of a continuing, regular information sharing process.

FINANCIAL AID OFFICER'S SIGNATURE

DATE

SECTION IV Alternate Sources of Funding (for WIA Office Use Only)

Yes Program \$ Yes Program \$

Unmet financial need from Sec. III \$ minus alternate funding from Sec. IV \$ equals adjusted unmet financial need \$

I certify that funds are not available or are inadequate from other financial resources such as TAA to ensure the participant's needs are met. After review of partner agencies, other social service agencies, and other community resources, I have determined that WIA Funds must be used in the mix of available resources. I certify that WIA funds will be coordinated with other funds and there will be no duplication of resources.

WIA SERVICE PROVIDER'S SIGNATURE

DATE

"Equal Opportunity Employer (EOE)/Program" and "Auxiliary aids and services are available upon request to individuals with disabilities"

Attachment D

Questions & Answers Policy Clarifications

1. Clarification Regarding the Use of the “Coordination of Training Funds” Form

QUESTION 1. Section III of the form describes "Cost of Attendance." The form includes lines for various elements of Cost of Attendance, including Tuition, Fees, Supplies, Books, etc. There are also lines for "Other" costs.

I looked for, but I couldn't find, a definition of the term, "Cost of Attendance." I assume that this term includes a variety of training costs as well as training-related expenses, including the student's cost of living while s/he is attending school. As I understand it, these costs may include housing, food, transportation, etc., necessary to ensure the student's participation in the training activity. Am I correct about that?

Answer: Yes, however the school completes this based on their formulas, calculations, etc. WIA staff should not be instructing the schools on how or what should be reported in section III of the Coordination of Training Funds form.

QUESTION 2. This question is also about Section III of the form. This section is to be completed by a Financial Aid Officer at the school.

We understand that eligible training provider typically have a methodology to arrive at a total Cost of Attendance. They use a number that is generated from the FAFSA process. But, the school doesn't always have the detailed information about the cost of books, supplies, etc. Evidently, it is a burden on the school's Financial Aid office to pull all of this information together. Usually, another office within the school - like the Bursar's Office -- is responsible for billing those items.

So, we would like permission to use one of the "Other" lines in Section III to describe a "Total Cost of Attendance" for the student -- without completing the itemized information about tuition, books, tools, etc. The Total Cost of Attendance would then be used in the usual manner to arrive at an unmet financial need (after subtracting the student's non-WIA financial aid).

Does that approach sound OK to you?

Answer: The Financial Aid Officer at each school has a methodology to arrive at a total of Cost of Attendance, and will complete the form. The WIA staff should not be instructing the schools on how or what should be reported in section III of the Coordination of Training Funds form.

QUESTION 3. As an alternative, in lieu of asking the school to complete Section III of the Coordination of Training Funds form, would it be acceptable for the Career Connection Center to maintain a copy of the Financial Aid Award letter that is routinely generated by the school's financial aid office?

For example, I have a copy of a "Financial Aid Award Offer" from Metro Technology Centers. The letter describes the student's name and address, his/her "budget" (i.e., Cost of Attendance), the financial aid that the student is eligible for (including grants & loans), and the "Remaining Need" that is not covered by WIA financial aid.

Revised – February 3, 2009

The Financial Aid Award Offer appears to meet the primary objectives of the Coordination of Training Funds form. That is, it shows that there is a portion of the student's Cost of Attendance that is not being met by other available resources.

Can we get OESC's permission to use the Financial Aid Award Offer as an alternative to the Coordination of Training Funds form?

Answer: The Financial Aid Award Offer can NOT be used as an alternative. The Coordination of Training Funds form is a REQUIRED form to be completed if a WIA participant is going to receive training. The WIA staff should not be instructing the schools on how or what should be reported in section III of the Coordination of Training Funds form.

2. Clarification Regarding the Use of ITA's for a Post-Graduate Level Program

QUESTION 4. I have been working with [Name of Participant Withheld] who wants to complete his MBA degree from Oklahoma Christian University using a combination of TAA and WIA funds. [I have been told] ... that the board has told us that we can not use WIA funds to pay for Master Degree programs. Can you advise me on this policy?

Answer: Thanks for your question. If WIA must be used for this man's program, the COWIB's ITA Policy should be used for guidance. The COWIB has placed a limit on the duration and cost of training, but there is no limit on the level of training. Post-graduate level training is allowable -- provided that it is necessary in order for the participant to obtain employment at a suitable wage rate.

3. Clarification Regarding the Use of ITA's for General Studies Courses (as a Program Requirement)

QUESTION 5. I have a customer who aspires to become a Rad Tech. His situation is similar to lots of other customers. He has the aptitude to work in radiography. An IEP has been completed, and it indicates "Rad Tech" as his training goal. He is enrolled at OSU-OKC. He's in his first semester. He hasn't been fully accepted into the Rad Tech program yet, but he is working on general studies courses that are required in the program.

I think if the customer selects a program of training, then an ITA may be used to pay for that training (as long as other program requirements are met) even if the customer hasn't yet been formally accepted into the program. Does that sound right to you?

Answer: Thanks for your question. As you know, in the WIA program, ITA's "shall be used for [customers] who select programs of training services that are directly linked to employment opportunities in the local area...."

If the customer's IEP has been properly completed, then it stands as documentation that he has selected "Rad Tech" as his program of training. Consequently, the customer's ITA funds may be used to pay for any coursework that is required to complete the program, including general studies courses. In this way, we have a method to maximize customer choice.

QUESTION 6. I'm still concerned, though. In the TAA program, we have been told that we're not permitted to pay for "pre-requisites." Are the WIA rules different?

Revised – February 3, 2009

Answer: The rules for TAA stand separately from the rules for the WIA program. So, inconsistencies between the two programs don't matter. If WIA funds are being used to pay for the customer's training, then the WIA policies must be followed.

QUESTION 7. I know that the Rad Tech program is very competitive and there are so many people who apply that it is hard to get into. So, what will the customer do if he is not fully accepted into the Rad Tech program? What would he do with his general studies credits if he isn't allowed to complete? In this case, would WIA funds be paying for classes that he would not end up using?

Answer: You raise a good question. We struggle with this issue constantly – even with students who are fully accepted into a highly-competitive program of training. There are students who drop out, lose interest, change their career goals. That's why we require each customer to carefully define their career / training choices through a process of comprehensive assessment and IEP development.

In the case of this student, if he isn't fully accepted into the Rad Tech program – or, if for any reason, he's not allowed to complete the program -- then a re-assessment would be required. A revised IEP would need to be completed.

QUESTION 8. So we would have to pay for more training then?

Answer: Well, that would depend. Please be mindful of the Act's requirement to maximize customer choice. We would like to provide as much training assistance as the customer reasonably needs. That being said, the COWIB has established limits on the dollar and duration of an ITA.

If the customer has funds left in his ITA, then the COWIB's Policy would permit him to use them on an alternate program of training (assuming that the re-assessment supported a different training goal).

The Bottom Line: There is nothing in the WIA Regulations or Act that prohibits paying for general studies classes in the situation you describe. The WIA Service Provider needs to make sure that a career pathway has been properly documented for this individual and the training is associated with a demand occupation.

4. Additional Questions and Answers from OETI #15-2008

Question: I know that WIA participants have to apply for Pell Grant in order to receive WIA funds for training, but we have one training provider who is on the State Provider List in a demand occupation who does not receive Pell Grant funding from the Feds. Are we still required to use the Coordination of Training Funds form to utilize WIA funds for training cost?

Answer: Yes, even if the Training Provider is not eligible for Pell funding, they still need to complete section III of the Coordination of Training Funds form.

Question: The training provider is not Pell eligible, which they have documented on the Coordination of Training Funds form, and therefore does not use any type of formula to calculate the Total Cost of Training. And they only record the exact dollar for training (tuition, fees, and books) which is \$4000.00 on the Coordination of Training Funds form and the unmet need is \$4000.00. Is the WIA service provider only able to help with the \$4000.00 and no supportive services?

Answer: Non-Pell eligible Training Providers do not calculate the unmet need the same as Pell eligible Training Providers. So in the event the Coordination of Training form section III indicates that the Training Provider is not Pell eligible and the unmet financial need determined by the Financial Aid officer equals the

Revised – February 3, 2009

cost of attendance (tuition, fees, and books), local WIBs may authorize case by case supportive payment(s) in excess of the unmet financial need which would allow participation in WIA Occupational Skills Training.

Question: Are ITAs allowed for youth participants?

Answer: Yes, On July 7, 2005 the State of Oklahoma was granted a waiver of the prohibition on the use of ITAs for Older and/or Out-of-School Youth at 20 CFR Section 664.510 through June 30, 2009. Pursuant to Oklahoma's waiver, Older and/or Out-of-School Youth may select eligible training providers from the Eligible Training Provider List thru the use of an ITA.

Question: Can an ITA be used for an older youth even though he is classified as in-school... (he was originally enrolled as an IS Youth and is now 19)?

Answer: ITAs cannot be utilized for youth that were originally enrolled as a younger youth and/or in-school youth. However, under the state's Work-Flex authority, Workforce Investment Boards may request and be granted a waiver to allow the use of ITAs to include youth that were enrolled as younger or in-school youth but now meet the minimum qualifications for enrolling in post-secondary education.

NOTE: In November, 2008, the COWIB applied for and received a waiver to allow the use of ITA's for youth who were enrolled as Younger or In-School Youth, but who now meet the minimum qualifications for enrolling in post-secondary education.

Question: There appear to be two categories of supportive services: training-related and personal. The second sentence of item F on page 5 reads "Training related costs not available through the eligible training provider must be provided as a supportive service in accordance with local supportive service policy and procurement policy, and must not exceed the unmet financial need that was determined by the financial aid officer."

Answer: OESC has not defined two categories, we are saying that there are cost that are not tuition cost (books, uniforms, tools, etc) that can be paid directly to the Eligible Training Provider, thru the ITA that are required to complete the training. If those items are required and are not available through the Eligible Training Provider they must be provided as supportive services.

Question: Our (the local WIA area's) interpretation is that training costs directly paid to the eligible training provider and "training related" supportive services (i.e. tuition, fees, books, equipment/tools, uniforms, supplies, and travel/lodging) required by curriculum must not exceed the unmet financial need as indicated on the Coordination of Training Funds form. That does not include "personal" supportive services such as groceries, rent, etc.

Answer: No, it includes all supportive services. Training related costs are paid thru the ITA with an ITA training voucher, OESC has not referred to them as training related supportive services. If the required training related cost is not available at the Eligible Training Provider then it must be provided as a supportive service. This simply means that it is not paid through an ITA voucher or deducted from the ITA amount. It is processed and tracked as a supportive service in accordance with local WIB policy. The training costs and the supportive service costs together cannot exceed the unmet financial need for the period of training that is reflected on the Coordination of Training Funds form.

Question: Most of the training institutions we work with fill out the Coordination of Training Funds form on a semester (not yearly basis). Whatever the time frame, would we start with the new "unmet financial needs" amount and work with the customer.

Answer: Yes, a new Coordination of Training Funds form is required each designated period of training. The financial aid officer at the training institution will be responsible for determining the participant's cost of training and unmet financial need. The Coordination of Training Funds form section III must be completed by the financial aid officer, which will show the cost of training and the unmet financial need. OESC will be monitoring to make sure that the payments of training vouchers and supportive services (training related cost

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and/or personal) do not exceed the unmet financial need which is listed on the Coordination of Training Funds form. Also, making sure that local WIB ITA and supportive service policy limits are not exceeded. (Additional budget forms will not be accepted to arrive at the unmet financial need amount)

All financial resources, excluding loans, including WIA funds (training and supportive service funds) cannot exceed the total cost of attendance. If the participant's unmet financial need has already been met by the combination of funds, additional supportive services funds cannot be expended on behalf of that participant. And even though the training institution fills out the Coordination of Training Funds form on a semester basis instead of yearly, you would still need to follow your local WIB policy for training cost limits and supportive service limits for the individual's total unmet financial need.

Example:

Financial Aid Officer completes a Coordination of Training Funds form each semester for a WIA participant that is going to be attending training. The unmet financial need for each semester ends up being \$5,000 (\$5,000 x 4 semesters) which would equal \$20,000. The Board's ITA limit is \$7,000 per participant and the Board's supportive service policy limit is \$2,000 per participant. The limit of WIA funds that can be used towards the unmet financial need would be \$9,000.

In the above example the WIA service provider would have to decide how to best apply the dollar limits. (Do you spend it all in one semester or stretch it out over several semesters?) It is very important for the WIA service provider to determine if the participant is financially capable of attending training before enrolling them into a training program. Regardless, WIA service provider cannot exceed Board established ITA or supportive service dollar limits.