



Individual Training Account (ITA) Policy: Philadelphia Works, Inc.

Overview:

An “individual training account” (ITA) is a funding option provided through the Workforce Innovation and Opportunity Act (WIOA) and Temporary Assistance for Needy Families (TANF). Through ITAs, eligible individuals can access quality training to help obtain employment in high demand occupations.

Individual Training Accounts fund training programs that appear on the Eligible Training Provider List (ETPL) to assist customers obtain employment in High Priority Occupations (HPOs) through job training. ITA funding is not guaranteed and is contingent on available funding and Philadelphia Works’ Investment strategy.

Philadelphia Works establishes an agreement with eligible training providers on behalf of an eligible participant. EARN-eligible and WIOA Title 1 Adults/Dislocated Workers can select a training program from the State’s ETPL in consultation with the PA CareerLink® center staff. These consultations include discussion of the individual’s career goals, appropriate trainings that can support these goals, program quality, and performance information.

Philadelphia Works adopts this policy to guide the investment of WIOA Title I funds for the use of ITAs. The investment of funds will be driven by our strategic priorities, High Priority Occupations (HPOs), and customer choice.



ITA Eligibility Requirements

To be eligible for ITA funding, the following criteria must be met:

- Customers must complete an Individual Employment Plan (IEP) that details the participant's skills, interests, and abilities, documents the Career Services provided to the participant, and outlines specific goals for the participant to meet in order to obtain or retain employment that leads to self-sufficiency.
- Customers must first be considered eligible and appropriate for training, as determined by eligibility (WIOA/TANF) and their Workforce Advisor. If the customer is deemed ineligible or unsuitable for training, Workforce Advisors are required to connect them to alternative activities to increase their career readiness. Workforce Advisors are required to use a check list (See Exhibit 2) to assess whether a customer is both eligible AND suitable for the stated requirements of the training, as outlined on the ETPL. The Workforce Advisor will review the IEP once completed and will instruct the customer to look at the ETPL site for potential training programs they would be interested in applying to. Once the customer has reviewed the ETPL list and chosen potential training programs another conversation will occur where based on the IEP assessment and the training programs chosen, the Workforce Advisor will discuss what training program might result in the best success for the customer.
- ITAs will not be issued to customers who do not have a high school diploma, GED, or equivalent. ITAs can be considered for participants without a diploma or GED if they are simultaneously enrolled in a program to obtain these credentials (such as with an approved Adult Education partner).
- Customers are required to complete financial aid forms if the program qualifies. Pell, Workforce Pell, PHEAA, and related grants can be utilized concurrently with WIOA ITA funds but must be used before ITA funds if the customer qualifies. If the training program selected is greater than the approved amount, the customer must indicate how the remaining costs of training will be funded.
- ITA applications must be submitted to Philadelphia Works **at least two weeks** prior to the training start date for review and approval. **Please note** that in instances where the customer has selected a Training Provider who has not previously contracted with Philadelphia Works, a four-week lead time is required.
- A participant may be approved for one ITA contract and/or an alternate PA CareerLink® funded training course in any five-year period, regardless of program completion. Philadelphia Works may approve a second ITA along the same career pathway during the five-year period, or in other exceptional circumstances, if the participant continues to meet the eligibility requirements and the combined cost of the ITA does not exceed \$6,000.
 - Additional ITA-funded training requires prior approval from Philadelphia Works. All other requirements of this policy apply to the initial and additional ITAs awarded to an individual.



Funding Stipulations

The maximum amount of funding a participant may receive per ITA is \$6,000.

Exceptions to the ITA funding cap are very limited. In exceptional circumstances, including career seeker barriers, availability of funding, and other applicable factors, a Workforce Advisor may request that Philadelphia Works waive the funding cap and/or the five-year limit to provide additional support on behalf of a participant. Requests for funding above the ITA cap must be submitted directly to Philadelphia Works in memo that outlines the justification for the training program selected and the need for additional funding, as well as an outline of any barriers that led to the participant failing to secure program completion and/or employment after their first training program, and how these challenges have been addressed to ensure a positive outcome if they are pursuing a second training program within the five-year period. Requests will be reviewed and approved by the Philadelphia Works Chief Operating Officer (COO) on a case-by-case basis.

ITA funding will be issued based on training program enrollment, program start, and program completion. Training providers will receive 50% of the total ITA funding amount when a participant successfully enrolls in and begins an approved training program. A participant must be actively participating in an ITA program for an “academic week” to be considered enrolled in the program for purposes of ITA payments and training provider WIOA performance metrics. An “academic week” is defined as a customer participating in a minimum of 8 hours of asynchronous learning or three synchronous class sessions.

Training providers will receive the remaining 50% of the total ITA funding amount when a participant is successfully completes the training program. Information on this payment structure is further described in the training provider vendor agreement.

Philadelphia Works may adjust the funding available for each training program as needed based on funding availability and labor market analysis. Specific funding amounts will be determined through the ITA agreement established with the training provider.

Allowable ITA Expenses

Customers in qualifying programs must apply for Pell Grants, Workforce Pell, and other appropriate grants. Funding should be coordinated to the extent possible with other sources of assistance as detailed in WIOA section 134 (c)(3). ITA payments are permissible for the following expenses:

- **Tuition and non-tuition items.** Non-tuition items include books, supplies, uniforms, tools, graduation fees, license/certification exam fees, etc. that are not otherwise covered by a grant or other financial aid. Allowable ITA non-tuition items must align with costs on the approved ETPL service application for the training program. The amount provided for related expenses

will be equal to the amount charged to the provider or participant.

- **Supportive Services.** For additional information on the availability of services, see the Philadelphia Works WIOA Supportive Services policy.
- **Career Services:** WIOA allows for a variety of career and support services to be funded for participants in the Adult and Dislocated Worker programs. These services may be provided directly through CareerLink® centers or through other contracts outside of the ITA process.

Note on ITAs and Apprenticeships

Registered Apprenticeships listed on the ETPL qualify for ITA funding, with an \$8,000 funding cap per customer. Participants are encouraged to consider an Apprenticeship as a viable career pathway. Registered Apprenticeships on the ETPL are not required to be an HPO and may still qualify for an ITA. Priority in ITA funding will be given to training programs providing an industry-recognized credential. ITAs may also be leveraged to cover the cost of classroom instruction related to a registered apprenticeship program (see Philadelphia Works Apprenticeship Policy).

Customer Choice

Training services must be provided in a manner that maximizes informed customer choice in selecting an eligible training provider in accordance with the goals and objectives outlined in the client's Individual Employment Plan. Accordingly, each PA CareerLink® will make available to customers on the state list of eligible training providers. The list includes, at a minimum, a description of the programs through which the providers may offer the training services and performance/cost information about each provider. An individual who has been determined eligible for training services may select a provider after consultation with a provider. Workforce Advisors should assist customers in reviewing and assessing available training programs to make a selection that is suitable for their skills and interests. Customer choice must be exercised within the parameters of this policy. WIOA training service is not an entitlement program. As a result, individuals, regardless of eligibility, who seek training outside of these designated areas can be provided assistance in pursuing other sources of financial aid.

*Exception to ITA Services:

(a) Contracts for services may be used instead of ITAs only when one or more of the following five exceptions apply, and the local area has fulfilled the consumer choice requirements of [§ 680.340](#):

- (1) When the services provided are on-the-job-training (OJT), customized training, incumbent worker training, or transitional jobs.
- (2) When the Local WDB determines that there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs. The determination process must include a public comment period for interested providers of at least 30 days, and be described in the Local Plan.
- (3) When the Local WDB determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment, as described in [paragraph \(b\)](#) of this section. The Local WDB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to



the individuals with barriers to employment to be served. The criteria may include:

- (i) Financial stability of the organization;
 - (ii) Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and
 - (iii) How the specific program relates to the workforce investment needs identified in the local plan.
- (4) When the Local WDB determines that it would be most appropriate to contract with an institution of higher education (*see* WIOA sec. 3(28)) or other provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided that the contract does not limit consumer choice.
- (5) When the Local WDB is considering entering into a Pay-for-Performance contract, the Local WDB ensures that the contract is consistent with [§ 683.510 of this chapter](#).
- (b) Under [paragraph \(a\)\(3\)](#) of this section, individuals with barriers to employment include those individuals in one or more of the following categories, as prescribed by WIOA sec. 3(24):
- (1) Displaced homemakers;
 - (2) Low-income individuals;
 - (3) Indians, Alaska Natives, and Native Hawaiians;
 - (4) Individuals with disabilities;
 - (5) Older individuals, *i.e.*, those aged 55 or over;
 - (6) Ex-offenders;
 - (7) Homeless individuals;
 - (8) Youth who are in or have aged out of the foster care system;
 - (9) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
 - (10) Eligible migrant and seasonal farm workers, defined in WIOA sec. 167(i);
 - (11) Individuals within 2 years of exhausting lifetime eligibility under TANF (part A of title IV of the Social Security Act);
 - (12) Single parents (including single pregnant women);
 - (13) Long-term unemployed individuals; or
 - (14) Other groups determined by the Governor to have barriers to employment.
- (c) The Local Plan must describe the process to be used in selecting the providers under a contract for services.



Data Tracking and Reporting

Training Providers are required to report customer outcomes, including program attendance, Measurable Skill Gains (MSGs), program completion, credential attainment, and employment outcomes. Training Providers are required to submit monthly status updates on the progress of customers funded by an ITA through PhilaWorks. PACL staff will collaborate with Training Providers, as needed, to support the collection, verification, and reporting of customer-level data necessary for performance tracking and program compliance. The Commonwealth Workforce Development System (CWDS) is the system of record.

Contact

Any questions about this program or process should be directed to the Philadelphia Works Manager of Training and Apprenticeship, Kaila Shannon, at kshannon@philaworks.org.



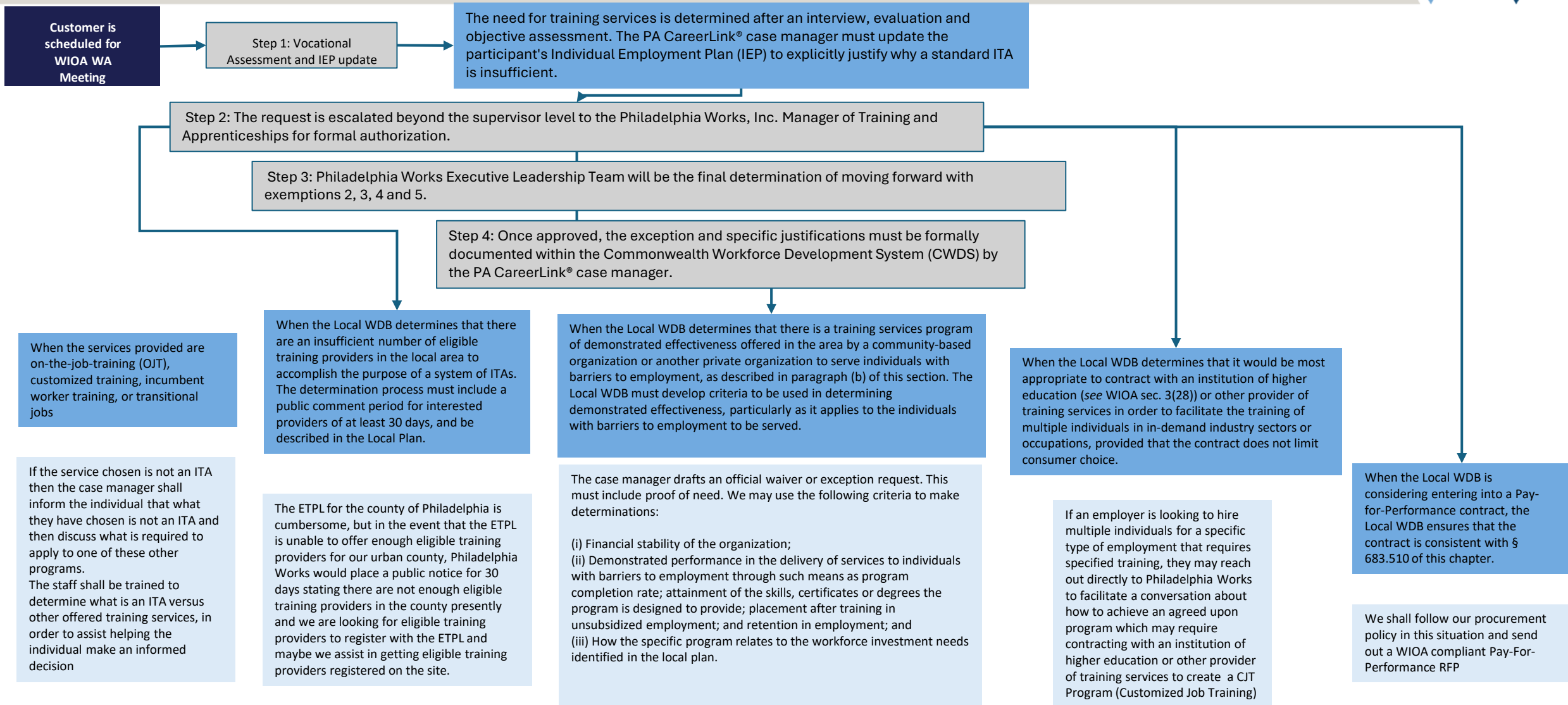
Please Exhibit A for Procedure as it relates to the exemptions above

Please Exhibit B for Checklist

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ITA Exemption Procedure

Exhibit A



Adult Vocational Skills Training

Tuition Assistance | Intake Form

Workforce Advisor – Adult Training Applicant Intake Form

This form is to be completed by a customer's Workforce Advisor and submitted with a completed application packet.

Applicant Information:

1. Applicant Name: _____ PID: _____

2. Funding Type: ☐ WIOA Adult ☐ WIOA DLW ☐ EARN

- a. ***If the customer is enrolled in the WIOA Dislocated Worker program, I understand that they are eligible for the WIOA CAREER DWG program. Participants enrolled in this program are eligible to participate in a broader array of training and education programs at a higher expense threshold than normally offered, through September 2023. The following initial signature is to confirm that I have reviewed these opportunities with the customer if enrolled in the WIOA Dislocated Worker or WIOA CAREER DWG programs. X*** _____

3. PA CareerLink[®] Center Location: _____ Workforce Advisor: _____

4. Training Program Assessment Type:

- a. ☐ Provider Assessment: Pass / did not pass
b. ☐ CASAS Score: Math _____ Reading _____
c. ☐ Other: _____
d. ☐ Not applicable

5. Does the customer meet other training pre-requisites (i.e., background check, physical, transcripts)? ☐ Yes ☐ No

6. Has the customer completed all other requirements for submitting a completed PA CareerLink application packet?
☐ Yes ☐ No

Intake questions

Please document notes relevant to the customer's training interest and readiness based on your conversation, using the suggested template below.

Program Interest and Background

1. What industry and/or job are you trying to get in to? What interests/ excites you about this kind of work?
(Workforce Advisors, below are some follow-up questions you can use to guide the conversation)
 - Do you know anyone else who has worked in this field?
 - Do you have any previous experience in this industry?
 - Have you had a chance to explore any of the major employers in this field?
2. Why do you feel that this training program is a good fit for you? Below are some possible follow-up questions:
 - What does this program offer that makes it stand out?
 - What kind of extra supports does the program offer that you might need?
 - Is the training location and schedule convenient for you?
3. What might prevent you from getting a job in this field, even after you complete training? Below are some possible follow-up questions:
 - How would your typical work schedule fit in with your personal or family schedules? For instance, many Nurse Aide positions require you to work from 7am-7pm, which may conflict with some childcare options.
 - Will you need a driver's license and/or a car to get to work?
 - Do you have criminal background that may prevent you from getting jobs in some occupations?
 - For healthcare, are you vaccinated or willing to get the COVID-19 vaccine?
4. What do you think will be most challenging about going back to school? Below are some possible follow-up questions:
 - When was the last time you were in school? Did you enjoy school?
 - Have you ever started a training or school program but not been able to finish? What would you do differently?
 - Have you spoken with a program representative about the time needed to complete the program?
5. Taking the time to study and get your homework completed can sometimes be challenging. What is your plan for ensuring that you commit your time to school, even after class? Below are some possible follow-up questions:
 - Have you talked to your close friends and family about how they can support you in school?

Adult Vocational Skills Training

Tuition Assistance | Intake Form

Conversation Notes:

Do not include any sensitive information about their life situation or personal details which are not relevant to their interest in training.

Exhibit B

Checklist for Training Eligibility:

Is or Has the Customer.....

- ☐ 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
- ☐ Have the skills and qualifications to participate successfully in training services
- ☐ Has selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individuals are willing to commute or relocate
- ☐ Unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, Trade Adjustment Assistance (TAA), and Federal Pell Grants established under title IV of the Higher Education Act of 1965, or require WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants (provisions relating to fund coordination are found at [§ 680.230](#) and WIOA sec. 134(c)(3)(B))
- ☐ If training services are provided through the adult funding stream, are determined eligible in accordance with the State and local priority system in effect for adults under WIOA sec. 134(c)(3)(E) and [§ 680.600](#).