Policy Letter #8

TO: **All Mid-Carolina Workforce Development Board Service Providers**

FROM: **Samantha Wullenwaber, Director**

SUBJECT: **Individual Training Accounts (ITA) Policy**

PURPOSE

This policy establishes guidelines for Mid-Carolina Workforce Development Board (Mid-Carolina WDB) Service Providers regarding the administration and provision of Individual Training Accounts (ITAs) for participants eligible under the Workforce Innovation and Opportunity Act (WIOA). It outlines the requirements for determining eligibility, issuing ITAs, monitoring participant progress, and ensuring compliance with federal, state, and local workforce development regulations.

BACKGROUND

The Mid-Carolina WDB provides oversight and guidance for WIOA-funded workforce development activities within its local workforce development area. ITAs are a key mechanism used to support eligible participants in obtaining occupational skills training that leads to employment and economic self-sufficiency.

This policy establishes minimum requirements for the provision of ITA-funded training services. Service Providers may develop additional local procedures, provided they remain consistent with this policy and comply with WIOA, U.S. Department of Labor (DOL) regulations, and directives issued by the State of North Carolina.

Training services funded through ITAs are intended to help individuals obtain the skills necessary to secure employment, retain employment, or advance in their careers through training that leads to recognized credentials aligned with labor market demand.

ACTION

Training Services Eligibility

Training services may be provided to employed or unemployed individuals who have received career services and, at a minimum, have completed one of the following:

- An interview
- An evaluation or assessment
- Career planning
- Another documented method that enables the WIOA Service Provider to determine eligibility and training needs

Training services must be determined necessary when it is established that the individual is unlikely or unable to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment without additional training.

Training Provider Selection

In consultation with a Career Advisor, participants will review the State of North Carolina's Eligible Training Provider List (ETPL) to determine available training options. The following information will be discussed with the participant:

- Training provider enrollment requirements
- Training performance outcomes
- Total cost of the selected training program

Participants are responsible for selecting a training provider from the State-approved ETPL that has been approved for use within the Mid-Carolina local workforce development area.

Career Advisors must ensure that the selected training program leads to a WIOA-recognized credential and aligns with the participant's employment goals.

Definition

An ITA is a payment agreement established on behalf of an eligible participant with an approved training provider. ITAs may be used to cover:

- Tuition
- Required training-related fees
- Mandatory course materials as identified in the course description or syllabus

Additional items necessary for successful training completion may be provided; however, these must be classified as supportive services. The participant's financial need must be documented through a case note in NCWorks Online.

Participant Eligibility

To receive an ITA, the participant must:

1. Be enrolled and in **good standing** in the WIOA Title I Adult, Dislocated Worker, or Youth program.
2. Be assessed by **Career Advisor** and determined to require training to secure or retain employment.
3. In consultation with a **Career Advisor**, select an approved training provider listed on the State of North Carolina ETPL and approved for the Mid-Carolina WDB local area.
4. Have an Individual Employment Plan (IEP) or Individual Service Strategy (ISS) in the participant's file demonstrating the need for training and confirming that completion of the training is likely to lead to employment.

For participants enrolled in the WIOA Youth Program, the training must:

A. Be outcome-oriented and aligned with the occupational goal specified in the ISS;
B. Be of sufficient duration to provide the skills necessary to meet the occupational goal; and
C. Result in the attainment of a recognized postsecondary credential.

Time Period for Using the ITA Voucher

Once an ITA voucher is issued, it must be used by the training provider within thirty (30) days. If the participant does not enroll in the training program within this timeframe, a new voucher must be issued.

A case note in NCWorks Online must document the reason for issuing replacement voucher.

Participants generally have two (2) years to complete their credential and/or curriculum program. This timeframe may be extended when additional developmental or remedial coursework is required. However, no more than twelve (12) credit hours of remedial coursework will be approved.

To establish a consistent process for serving WIOA Title I participants who are within twelve (12) credit hours of completing an approved degree, credential, certificate, or curriculum program. The intent is to support timely completion while ensuring that WIOA-funded training is necessary, reasonable, allowable, and directly connected to the participant's employment goals.

Participants entering WIOA-funded training with twelve (12) or fewer credit hours remaining should normally complete the remaining requirements within the next available academic term or within the timeframe established by the training institution.

Completion Timeframe
Participants generally have two (2) years to complete an approved credential and/or curriculum program.

When circumstances outside the participant's control prevent completion within the anticipated timeframe, an extension may be considered. The Career Advisor must document the reason for the extension and obtain approval in accordance with local procedures.
Developmental or remedial coursework may extend the training timeframe when necessary; however, **no more than twelve (12) credit hours of remedial coursework may be approved**.

Eligibility for Near-Completion Training
A participant may be considered for WIOA Title I training assistance when the participant has twelve (12) or fewer credit hours remaining to complete an approved degree, credential, certificate, or curriculum program.

Prior to approval, Career Advisors must verify that:

1. The participant meets all applicable WIOA Title I eligibility requirements.
2. The training program supports the participant's documented employment and career goals.
3. The participant is currently enrolled in, or has previously attended, the institution offering the program.
4. The participant has no more than twelve (12) credit hours remaining to satisfy the program's graduation or completion requirements.
5. The remaining courses are necessary for completion of the degree, credential, or certificate.
6. The participant has a reasonable likelihood of completing the remaining requirements within the approved training period.
7. Other available financial assistance has been identified and coordinated in accordance with applicable WIOA requirements regarding the coordination of training funds.

Required Documentation
Before WIOA funding is authorized, the participant must provide documentation from the training institution verifying the remaining requirements. Acceptable documentation may include an official or unofficial transcript, degree audit, academic evaluation, graduation plan, or written verification from an academic advisor or registrar.

The documentation must clearly identify:

- The participant's program of study;
- Credits already completed;
- Courses and credit hours remaining;
- Anticipated completion or graduation date; and
- Any additional requirements necessary to earn the credential or degree.

Individual Employment Plan/Individual Service Strategy
The Career Advisor must document the training activity in the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS), as applicable. The plan should identify the credential to be attained, remaining coursework, anticipated completion date, employment goal, and how completion of the program will improve the participant's ability to obtain or retain employment.

Credential Verification and Case Documentation
Upon successful completion, the participant must provide documentation verifying attainment of the degree, certificate, license, or other recognized credential. Career Advisors must enter the credential attainment and support documentation into NCWorks within applicable reporting requirements.

The participant should continue to receive appropriate employment, placement, and follow-up services to support entry into employment related to the complete training.

Exception Review
Participants with unusual circumstances that do not meet the standard requirements may be submitted for management review. Any exception must include sufficient justification demonstrating that continued training assistance is reasonable, necessary, cost-effective, and consistent with WIOA requirements and local policy.

Payments
Payments for ITA-funded training will be made directly to the training provider. Payments may be issued:

- As a full payment for the training program, or
- Incrementally, based on milestones or training progress during the course of the program, and
- Payments must be issued to the training provider within 45 days of the ITA submission.

Training providers participating in this program MUST possess sufficient independent working capital to sustain business operations for up to 45 calendar days while invoices

and payment requests are actively being processed.

Requirements and Limitations

A. **Training Cost Limit**
The total cost of all ITAs issued to a participant must not exceed the lifetime cap of per participant. Career Advisors must document each ITA issued and maintain records of cumulative costs through case notes in NCWorks Online.

B. **Out-of-State Training Providers**
ITAs are normally issued only for training providers listed on the North Carolina ETPL. If training with an out-of-state provider is justified:

- The provider must be listed on the ETPL of its home state, and
- Documentation of this listing must be included in the participant's case file.

Approval from the Mid-Carolina WDB Director must be obtained prior to initiating the ITA, and the justification must be documented through a case note.

C. **Local Procedures**
Service Providers must develop and implement an ITA administration process consistent with this policy. Local procedures may include additional requirements provided they do not conflict with WIOA regulations or this policy.

D. **Monitoring Participant Progress**
WIOA Service Providers are responsible for monitoring participant progress in occupational training programs at least once per calendar month. Monitoring must include:

- Tracking academic progress
- Addressing participant challenges
- Ensuring compliance with training requirements

Service Providers must also ensure the timely recovery of tuition refunds in accordance with the training provider's refund policy when a participant withdraws or fails to complete training.

Monitoring
The Mid-Carolina WDB may review a sample of ITA expenditures during both desk reviews and on-site monitoring visits to ensure compliance with this policy.

If costs are identified that should not have been included in an ITA, the Mid-Carolina WDB may:

- Question the cost, and
- Require the Service Provider to either reclassify the expense under supportive services or cover the expense using non-WIOA funds.

REFERENCES
Federal Register §680.230

TEGL 19-16: WIOA - Adult, Dislocated Workers, ES

ATTACHMENTS

Attachment A: Financial Award Analysis
Attachment B: Training Authorization Voucher/ITA Certification
Attachment C: NextGen Training Authorization Form

CREATION DATE

July 2022

REVISION DATES

January 2024
December 2024
March 2026
September 2026