

Region VI Workforce Development Board 17 Middletown Road White Hall, WV 26554	Classification: Individual Training Account Scholarship Policy October 15, 2021
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Region VI Guidance Letter No. 5-15, R-7

To: All Region VI WorkForce West Virginia Centers- Managers and Staff
All Career Planners/Eligibility Determination Staff
All Youth Subcontractor staff
All Local Approved Service Providers

From: Region VI Workforce Development Board, Inc. (WDB)

Subject: Individual Training Account (ITA) Scholarship Policy

Purpose: This policy outlines the process for the Individual Training Account (ITA) system, (referred to as an Individual Training Account Scholarship in Region VI), established under the Workforce Innovation and Opportunity Act of 2014 (WIOA), to purchase training from a certified eligible provider of training services for adults, dislocated workers, or out-of-school youth who qualify for training services.

References: Sections 134, 181 of the Workforce Innovation and Opportunity Act and 20 CFR Part 680, and 681.550.

Background: The Workforce Innovation and Opportunity Act identifies the Individual Training Account as a means of providing training to individuals. The ITA system should be designed to provide customer choice within guidelines established by the local Workforce Development Board.

Policy: Region VI will not fund training for an individual who has obtained a Master's degree or better.

Region VI will not fund training for an individual who has obtained a certification/license, 2-year associates degree, or 4-year or more college degree from an accredited training provider. Exceptions to this policy may occur if the training is supported by the Career Planner and has been approved by the Exceptions Committee of the Region VI WDB. The provisions of #8 in this policy apply to this circumstance.

ITA Scholarship funds will only be obligated based upon Region VI funding levels at any point in any program year. Reductions in funding at any point, in any program year, may reduce, and, or eliminate ITA Scholarship obligated funds.

The Region VI Workforce Development Board has established the following guidelines to be used when implementing ITA Scholarships:

1. ITA Scholarship's will be issued to eligible participants for a maximum training period of 12 months at a time, not to exceed 24 months.
2. In the event a participant is approved for a course of training, which will take 13 to 24 months to complete, it is the responsibility of the participant to re-apply with their WIOA Career Planner for additional WIOA funds necessary to cover the costs of completing their training by the first day of the 12th month of their training.

3. WIOA funds obligated to cover training costs shall be in accordance with the following fee structure:
- Maximum of \$6,000.00 for 0-1200 clock hours of training (training time up to 12 months) *
 - Maximum of \$10,000.00 for 1201-1800 clock hours of training (training time over 12 months to 18 months) *
 - Maximum of \$12,000.00 for 1801-2400 clock hours of training (training time over 18 months to 24 months) *
- *The tuition levels outlined above will be awarded based on the course information entered in the MACC by the Training Provider.***
4. Funds will cover required costs, including tuition, fees, books, supplies, tools and special equipment.
5. Participants who begin training prior to receiving an ITA Scholarship may be covered by Region VI (subject to the availability of funding), if the following conditions are met prior to the training start date:
- Participant has been issued a Conditional WIOA Funding Voucher by a Career Planner
 - Participant has maintained WIOA eligibility
 - Participant has been tested and assessed
 - Participant has completed the research assignment
 - Participant is currently enrolled and not changed his/her original training plan.
 - Participant has maintained satisfactory academic progress and is in good standing as determined by the service provider.
6. Customers who receive a Conditional WIOA Funding Voucher that has expired prior to receipt of WIOA funding will be eligible to apply for second year funding.
7. The training provider and participant shall document other sources of funding on the ITA Scholarship form.
8. Participants will be limited to one (1) WIOA funded ITA training opportunity in a 1 (one) year period. ("Training opportunity" means the customer started a training program and WIA/WIOA funds were utilized to pay for the training, and the customer may or may not have successfully completed the training program.) The one (1) year period begins on the date the individual completes/separates from the training program.

Should a customer request a second WIOA funded ITA training upon expiration of the 1-year time limit, the request must be submitted to the Exceptions Committee for consideration. The following must occur before the request can be submitted for consideration by the Exceptions Committee:

- The customer must meet current WIOA eligibility guidelines; and
- The WIOA Career Planner must recommend and provide appropriate documentation justifying the funding of a second training.

The preceding guidance pertaining to 1 WIOA funded training opportunity in a 1-year period or requesting a second WIOA funded training upon expiration of the 1-year time limit, will **not** apply to:

- ✓ Customers who have participated **at the request of an employer** in a WIA/WIOA-funded, Customized, Incumbent Worker, Transitional, or On- the-Job Training program. Those customers will be assessed by a Career Planner, on an individual basis, to determine if they are eligible for additional WIOA funded training through an ITA Scholarship without having to go through the Exception's Committee for approval.

- ✓ Customers who have completed a Pre-Apprenticeship program who want to participate in an Apprenticeship may still be eligible for that training without having to go through the Exception's Committee for approval. Assessment and support of the Career Planner for the customer to be funded for the Apprenticeship must still be done.
- ✓ Customers who are applying to upskill from one level of medical certification to another (ex. - Certified Nursing Assistant (CNA)/ Medical Assistant to Licensed Practical Nurse (LPN), or certified LPN to Registered Nurse (RN)) and who:
 - Paid for the training with WIA/WIOA or non-WIA/WIOA funds; and
 - Who have a minimum of 9 continuous months of work history in their medical field of certification.

BUT Career Planners must follow the guidelines below in approving the upskill training:

 - Customers who have gaps in employment history of 3 months or more, or termination from one or more jobs, must still have their funding request submitted to the Exceptions Committee; and
 - Customers who have lost their medical certification/license for any reason (ex.- let it lapse, misconduct on the job, etc) must still have their funding request submitted to the Exceptions Committee.

Note: WIOA funding will not be allowed for a 3rd ITA training.

9. A degree or certificate must be obtained upon completion – not to exceed Bachelor's level. A degree or certification must lead to a demand occupation as defined here:

Revised June 29, 2017

For purposes of awarding a WIOA ITA Scholarship, a Demand Occupation will be defined as:

- A. Occupations listed on the current list of West Virginia Demand Occupations for Workforce Development Area 6; OR
 - B. Occupations showing a minimum of 2% growth rate on the current list of Long-Term West Virginia Demand Occupations for Workforce Development Area 6; OR
 - C. Occupations showing a minimum of 25 projected openings and/or 25 replacement openings on the current list of Long-Term West Virginia Demand Occupations for Workforce Development Area 6; OR
 - D. Occupations which do not fall under A, B, or C above, but which the DOL/ETA are funding training for through National Dislocated Worker Grants (NDWG).
Additionally, for purposes of funding WIOA On-the-Job Training (OJT), Customized Training, Transitional Training, or Incumbent Worker Training, any or all of the above may apply, plus:
 - E. Documentation of support employment in the OJT, Customized Training, or Incumbent Worker Training occupation following completion of training.
10. Individual Training Account Scholarships will be issued to residents of Region VI, with residency being verified through a WV Drivers License, State ID Card, or other document(s) which can verify current residency in the Region VI service area. Services can be offered to Dislocated Workers who are laid-off from a company located in Region VI, but who reside in another state/region as long as they are not receiving WIOA benefits from their state of residence.
 11. Individual Training Account Vouchers are allowable for online training programs with the following conditions:
 - The Online training course must meet all initial and or subsequent eligibility requirements per the Workforce Innovation and Opportunity Act.
 - The cost of personal computers or laptops and/or operating systems/other software will not be absorbed by Region VI. Exceptions will be considered when a specific computer and/or operating system/software is required and billed as part of the training provider's tuition.
 - The training provider agrees to comply with the Region VI Invoicing Policies and Procedures for Online training programs. (See attached Policy)

12. Individuals changing programs will not be eligible for WIOA funding nor will the costs of any repeated course(s), lost books, etc. be borne by WIOA, unless extraordinary circumstances are involved and a re-assessment is conducted by a Career Planner, who recommends the change and documents the reason for the change. If both the Career Planner and the training provider are in agreement in allowing the change, the change request must be submitted by the Career Planner to the Region VI Workforce Development Board Executive Director for consideration. Extraordinary circumstances should not include someone who simply changed their mind and does not like the program that they chose. Extraordinary circumstances may include someone who has attended class faithfully, who has made an effort to attain their original goal, but for some reason does not have the ability to complete said program successfully. An extraordinary circumstance could also include a school closing, forcing the student to transfer to another school to complete training. If the request for transfer is denied by the Executive Director, the training provider may appeal the decision to the Region VI Exceptions Committee by emailing Amy Hall at ahall@region6wv.org or by calling the Region VI WDB office at 304-368-9530.
13. The participant will be required to apply for a PELL grant if attending a training provider that participates in the PELL grant program. WIOA funds will then cover any tuition and approved costs not covered by PELL, not to exceed the current cap.
14. Service Provider should notify the appropriate Career Planner within seven (7) days of all withdrawals/completions (successful or unsuccessful).
15. Participants must adhere to the Region VI WDB attendance policy of either 80% of the instructional hours, or the training provider's attendance policy, whichever is higher. If this attendance policy is not being met at any time during the approved training time frame, the Region VI WDB may, at their discretion, terminate the funding of the participant failing to meet the attendance requirement.
16. Participants must maintain satisfactory academic progress as defined by the policy of the training provider institution they are attending. In the event this progress is not maintained, the participant may lose their status as a WIOA funded student.
17. In accordance with the Americans with Disabilities Act, eligible WIOA participants with special needs may request reasonable accommodations to be made by service providers (i.e. – special textbooks, equipment, etc.) in order for the participant to be able to complete course requirements during training.

Region VI may provide referrals for technical assistance to Service Providers and participants in meeting the requirements of ADA. Any requests for assistance above and beyond technical assistance must be submitted by the Career Planner on behalf of the participant to the Exceptions Committee.

18. There is no limit to the number of times an ITA may be modified. A modification to an ITA may be made by request of the training provider to the Career Planner, which then must be approved by the Career Planner (but only if the modification request does not involve changes in the funding level of the ITA). If the requested modification involves a change in the amount of funding, the Career Planner must submit the modification request to the Region VI WDB for final approval. No modification to the ITA involving changes to the funding level can be made until approved by the Region VI WDB.

The Region VI Workforce Development Board Executive Director may waive provisions of this policy when the Executive Director determines it is necessary in order to serve individuals with special circumstances.

Action: The Region VI WORKFORCE West Virginia System will be made aware of this policy. This policy will be sent to each Training Provider and a copy given to each WIOA participant.

This policy will become effective **October 15, 2021** and shall be in effect until revised or cancelled by the Region VI Workforce Development Board.

Disclaimer:

This policy may be subject to change as additional federal regulation and TEGLs and or state policies are released that are contrary to or otherwise different from Region VI WDB's interpretation of WIOA.

Attachments:

Region VI Invoicing Policies & Procedures

Region VI Workforce Development Board

17 Middletown Road
White Hall, WV 26554
Phone: 304-368-9530
Fax: 304-368-9532

TO: Region VI Training Providers

FROM: Maria Larry, Executive Director

SUBJECT: ITA's Invoicing Policies and Procedures
(In-person and on-line training)

DATE: Revised April 25, 2022

Each Region VI Training Provider will adhere to the following invoicing procedures based upon ITA Scholarship's issued to eligible WIOA participants for a maximum training period of 12 months at a time, not to exceed 24 months. WIOA Funds obligated to cover the training costs shall be in accordance with the following schedule:

- Maximum of \$6,000.00 for 8-1200 clock hours of training (training time up to 12 months) *
- Maximum of \$10,000.00 for 1201-1800 clock hours of training (training time over 12 months to 18 months) *
- Maximum of \$12,000.00 for 1801-2400 clock hours of training (training time over 18 months to 24 months) *

*(Maximum amount will be calculated first on clock hours - then by number of months for those programs that don't measure in clock hours.)

WIOA participants attending training programs extending beyond 12 months will receive priority status in funding for the additional 12-month or less period, provided that the participant is still enrolled "fulltime" in the original training program, is making satisfactory academic progress, is in good standing with the training institution and WIOA funds are available. This information will be verified by completing the Enrollment Status Form provided by the career planner.

Invoicing Procedures (In-person Training)

1. 1st Year Enrollment Reimbursement: One Hundred percent (100%) reimbursement of the WIOA approved funding can be requested by the Training Provider after the WIOA participant attends the first day of class. Approved ITA must be on file in Region VI WDB office and participant attendance must be verified by Career Planner prior to payment of invoice. One Hundred percent (100%) reimbursement does not relieve the training provider from submitting required refunds to Region VI in accordance with their approved refund

policy. (See # 3 for Refund Policy guidelines) **NOTE:** If a participant can complete more than 1200 clock hours within the 1st year and does not require a 2nd year ITA, then the full WIOA approved funding can be invoiced at this time. **EXAMPLE:** Participant completes a 1350 clock hour training in the first 12 months – approved WIOA funds of \$10,000 can be billed at the time of 1st Year Enrollment.

2. **2nd Year Enrollment Reimbursement:** Invoicing for a second 12 months or less of training will be processed as in step #1 above, except the maximum amount will be an additional \$4000 for 18 month or 1201-1800 clock hour programs **or** an additional \$6000 for 24 month or 1801–2400 clock hour programs. Again, One Hundred percent (100%) reimbursement after the first day of class does not relieve the training provider from submitting required refunds to Region VI in accordance with their approved refund policy. (See #3 for Refund Policy guidelines)
3. **Refund Policy Guidelines:** All Region VI Approved Training Providers are required under Title 135CSR20 9.1.i.3 to submit their school's refund policy to the WV Community and Technical College System for approval in order to operate in the State of West Virginia. The Region VI WDB fiscal manager will obtain copies of all approved refund policies to ensure that each school adheres to their respective refund policy in the event that a WIOA participant discontinues training prior to the scheduled completion of their training program. Non-compliance of the training provider's refund policy may result in a hold on future payments, until resolved.
4. All signed invoices must be received in the Region VI WDB Office no later than the 5th calendar day for Training Providers to receive payment for the prior month(s). Invoices will be accepted electronically or faxed provided they meet the signature guidelines in #6 of this policy.
5. Invoices received after the 5th calendar day may not be processed until the following month.
6. Region VI WDB will accept a range of common methods of electronic signatures provided they are an actual signature and not simply a name typed into a signature block. Blue ink is preferred for signatures if sending electronically or by mail.
7. Individual invoices must be submitted for each funding source. (Adult and Dislocated) Identifying information must be complete, including an invoice specific Invoice #. Please do not use the same invoice numbers on all invoices, i.e. dates, #1, etc. Sequential Example: 2021-01, 2021-02, 2021-03, etc.
8. Electronic and fillable downloads of the attached WIOA/ITA Tuition Invoice forms can be found on the Region VI Workforce Development Board's website under the Training & Education Tab at www.regionviwv.org

Invoicing Procedures (On-line Training)

1. **1st Year Enrollment Reimbursement:** Fifty percent (50%) reimbursement of the WIOA approved funding can be requested by the Training Provider after the WIOA participant attends the first day of class – not to exceed a maximum of \$3,000. Approved ITA must be on file in Region VI WDB office and participant attendance must be verified by Career Planner prior to payment of invoice.
2. **1st Year Midpoint Reimbursement:** The remaining fifty percent (50%) reimbursement of tuition can be requested once the participant has completed a minimum of 50% of the clock

hours or 50% of the course material (*however the training provider tracks the students progress in the online course*) within the length of time allotted by the training provider to complete the course. (EXAMPLE: The course requires completion of 400 clock hours of instruction and/or 20 skill sets tests, to be completed within 6 months, with an additional 6 months allowed, for a total of 12 months. In order to be paid the remaining 50% of tuition costs, the student would have to have completed at a minimum of 200 clock hours or passed tests showing 10 of the skill sets were completed by the end of 6 months after enrollment) If a student does not complete the 50% clock hours and/or course requirements as documented by the training provider according to the timeline stated above, Region VI will not be responsible for payment of the remainder of the tuition. The remainder of the tuition to the training provider will become the student's responsibility.

3. Refund Policy Guidelines: All Region VI Approved Training Providers are required under Title 135CSR20 9.1.i.3 to submit their school's refund policy to the WV Community and Technical College System for approval in order to operate in the State of West Virginia. The Region VI WDB fiscal manager will obtain copies of all approved refund policies to ensure that each school adheres to their respective refund policy in the event that a WIOA participant discontinues training prior to the scheduled completion of their training program. Non-compliance of the training provider's refund policy may result in a hold on future payments, until resolved.
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Although no placement payments will be made to Training Providers, this does not relieve Training Providers in assisting in the job placement process of participants. Non-Placement of participants will/can affect performance standards of Region VI WDB and may affect your recertification as a Training Provider.