

WIA TITLE I-B AND ARRA PROGRAM MANAGEMENT POLICIES AND PROCEDURES

MEMORANDUM #09-04

To: All WIA Title I-B and ARRA Adult and Dislocated Worker Program Subrecipients

Subject: Personal Training Accounts (PTAs) Including Individual Training Accounts (ITAs) and Supportive Services

Supersedes: Policy for Use of Individual Training Accounts (ITAs) #08-04 Supportive Services #06-05A

Effective Date: July 1, 2009

Under the Workforce Investment Act (WIA) and the American Recovery and Reinvestment Act (ARRA), classroom training services for adults and dislocated workers will be provided through Individual Training Accounts (ITAs) to eligible individuals who are in need of intensive and/or training services. The WIA Title I-B and ARRA legislation also require that participants in need of training services must have the skills and qualifications to successfully complete a selected training program. Additional guidance regarding the use of ITAs is provided in Memorandum #__-08, *Classroom Training*.

While the WIA Title I-B legislation refers to ITAs specifically for the payment of classroom training and training related costs, Workforce Development Council Snohomish County (WDCSC) has chosen to adopt a broader concept for the payment of registrant costs that not only incorporates ITAs but also covers all types of client support costs including supportive services, including books, tools and supplies; classroom training tuition; short-term intensive seminar costs; on-the-job training employer reimbursements; work experience wages and benefits; and Individual Development Accounts (IDAs). The expenditure limits established by this WDC, described in detail below, extend over this broader concept of Personal Training Accounts (PTAs). Specific guidelines for the utilization of a given participant's PTA to fund supportive services, on-the-job training employer reimbursement, work experience wages and benefits, classroom training tuition

(through ITAs), and IDAs will be found under the policy and procedure memos specific to each of those activities.

WIA Title I-B and ARRA adults and dislocated workers who are eligible for intensive and/or training services are not to be dependent upon seeker services staff to prescribe a training program. Individual registrants found eligible for and able to benefit from WIA Title I-B and/or ARRA intensive and training services are expected to take an active role in managing their employment future through the use of ITAs. Each individual receiving intensive services and/or training under this approach will receive the information s/he needs (e.g. skills assessment, labor market conditions and trends, training vendor performance) to make an informed choice about her/his own employment future and the training to support that decision.

Training is an option available to eligible and enrolled individuals when it is determined by seeker services staff that they will be unable to obtain or retain employment through core or intensive services alone. Training is limited in cost, duration and must lead to employment in an approved occupation. Training is not intended to facilitate the acquisition of degrees, diplomas, or certificates strictly for the sake of education.

The term "supportive service(s)" means a service or services which are necessary to enable an individual who cannot pay for such service or services to participate in either the Adult or Dislocated Worker Program under WIA or ARRA. Supportive services are intended to be one-time or time limited services and do not include the acquisition, improvement, or retention of personal assets (e.g., automobiles or homes). Supportive services may be provided to a participant during program registration in intensive and training services and during the follow-up period after exit.

ITA Dollar Limits. WDCSC has established limits for ITAs at both the intensive and training services levels.

Service Level	Limit per participant	Time period for limit
Intensive	\$400	Rolling 6 months
Training	\$4,500	Rolling 12 months

The dollar limit per participant for a 6 month rolling calendar period from the date of registration at the intensive service level is \$400. This dollar limit is for all funded activities under intensive services, whether it be supportive services or short-term training and related costs. There are no limits between these activities. That is, any or all of the funds may be spent on supportive services, short-term training and related costs, or any combination of the two. The total amount available for these services cannot exceed \$400 in WIA Title I-B or ARRA funds over the rolling 6 month period. Should a given participant still be unemployed and participating in intensive service activities beyond the first 6 month period, the Site Operator may wish to consider allowing an additional \$400 ITA in the

subsequent calendar period depending on her/his progress toward completion of her/his Individual Employment Plan.

A participant is considered to be at the "intensive" service level if at least one of her/his planned and/or actual services as identified on her/his Individual Employment Plan are classified as intensive and no planned/actual services are classified as training and all associated participant costs are classified as supportive services and/or short-term training costs.

Training ITAs are limited to \$4,500 over a 12 month rolling calendar year from the date a participant enters into a training activity (or shortly before if needed to purchase tools, books, or supplies prior to the start of class). As is the case for intensive services, the ITA may be used for any of the fiscally supported activities in this category including supportive services, including books and supplies; tuition; on-the-job training employer reimbursements, work experience wages and benefits, and/or IDA training programs. [Please note that while work experience is classified as an intensive service, a participant must be determined eligible for training to participate in a work experience at which point the use of training ITAs apply.] If a participant is still actively engaged in training beyond the 12 month rolling calendar year, the Site Operator may consider allowing a second year allocation of an additional \$4,500. There is no limit to the number of years a participant may be eligible for ITA allocations as long as s/he is still engaged in appropriate training plan activities and successfully progressing toward the goal specified in her/his Individual Employment Plan.

A participant is considered to be at the "training" service level if one or more of her/his planned or actual services as identified on her/his Individual Employment Plan is classified as training. Associated costs may be classified as any combination of supportive services, short-term training costs, training tuition, on-the-job training employer reimbursement payments, work experience wages, and/or IDA.

Supportive services must be necessary for a given participant to complete her/his Individual Employment Plan, including post-exit follow-up activities, and be beyond her/his ability to pay. Supportive services are not entitlements and shall be approved by the Center Site Operator for a given participant on the basis of a documented financial assessment, individual circumstances, the absence of other resources, and funding limits. Supportive services may take the form of in-kind or cash assistance. Reimbursement shall be for actual costs up to the established limits. Supportive services in excess of the established limits must be requested in writing and approved by the Center Site Operator according to established policy for granting exceptions on PTA limits as described in Memorandum #__-04. In exceptional circumstances, requests for supportive services which do not meet the guidelines established below may be submitted to WDCSC. WDCSC approval must be granted prior to issuance of such supportive services A-19s or vouchers.

Partner direct services staff are to provide participants with accurate information about the availability of supportive services in the local area. These staff are also responsible for

referring applicants/participants to locally available services such as the 2-1-1 service. The provision of information and referral to other agencies for such resources is classified as a core service for both adults and dislocated workers.

Please note that the \$400 limit over a six month period of time for intensive services is not intended to be partnered with the training services allotment to increase the overall training limit. Intensive services level ITAs are intended specifically for assistance appropriate to the intensive services category, either as a stand alone category of activities or before or after a participant completes training. The six month time clock is tied to the date on which the individual entered an intensive services activity: any unused available funding within that category is "frozen," as is the six month time period, during participation in training.

Please also note that while WDCSC has determined that Individual Employment Plans may be written which establish an ITA account over 6 and 12 month rolling calendars for a given participant from the point s/he enters into an intensive or training activity, only that portion of funding for the plan that is available during the Program Year (July 1 through June 30 of the following year) in which the plan is initiated may be obligated. As each new Program Year begins, the remaining funds identified for the ITA may be obligated provided the participant is still registered or in follow-up status.

Use of Non-WIA/Non-ARRA Funds in ITAs. Any other cooperating funding source that wishes to combine resources for participants with the participant's WIA or ARRA PTA to create a broader WorkSource ITA may do so to form a "tool chest." Tracking of all funding sources must be separated within the ITA tracking and accounting system, but may be used to provide a seamless ITA for the participant. In this case, the dollar limits or caps associated with each non-WIA/non-ARRA funding source needs to be set according to the restrictions associated with that source and the desire of the local partner to use the resources in this fashion.

Thus, there is great flexibility around the use of an ITA as long as the use ameliorates a barrier to the participant's gaining of employment which provides for self-sufficiency as defined by WDCSC. The overall limit on WIA Title I-B and/or ARRA funds that may be committed per ITA category, per person as described above, remains the same across all types of needs. This dollar limit applies only to WIA Title I-B and ARRA funds and does not apply to combined resources from other sources. The participant and staff need to carefully develop the Individual Employment Plan, including activities to achieve the proposed goal, and look at the full range of funding options to meet that need. It should not be expected that WIA and/or ARRA alone should address the full range of most participants' needs, and the Individual Employment Plan should reflect the effort to identify other resources.

No staff person may require a client to apply for a loan before accessing WIA and/or ARRA assistance.

Approval and Exception Policy. There are two approval and exception policies, one related to ITAs issued directly by WDCSC and one related to ITAs issued by a Center Site Operator.

ITAs Issued by WDCSC: WDCSC may directly issue ITA funds in the form of a workplace scholarship for training to a WIA or ARRA participant selected through a standardized process. Such scholarships may exceed the above ITA dollar limit but must otherwise conform with all relevant PTA and, as appropriate, ITA requirements.

ITAs Issued by the Center Site Operator: The granting of all other ITAs requires local Center Site Operator approval of an Individual Employment Plan and ITA request package. These documents will be completed by staff with the client and will outline the proposed course of action, the other funding sources being explored or utilized for assistance to complete the plan, and will provide the information necessary to determine its reasonableness. It will also provide the information needed for the Center Site Operator to conduct an evaluation of the labor market demand and wage rate progression within the participant's chosen field that will lead to self sufficiency. Plans that do not have sufficient funding identified for completion will not be approved.

The Center Site Operator may grant an exception to the above ITA limits if the demand occupation clearly results in a meaningful wage and employment opportunity for the participant or addresses an exceptional barrier. The granting of exceptions can only be done on a case by case basis by the Site Operator who will also need to proactively adjust overall obligations for the remaining ITA resource pool accordingly. Exceptions are to be requested and documented in the participant file.

Tracking and Accounting. While ITAs are seamless in their presentation to the participant and in their overall dollar limitations, tracking of actual WIA Title I-B and ARRA expenditures will be done by the following expenditure categories:

1. supportive services
 - a. books and supplies (intensive or training depending on the activity supported)
 - b. other supportive services (intensive or training depending on the activity supported)
2. short-term training costs (intensive)
3. tuition (training)
4. on-the-job training employer reimbursements (training)
5. work experience wages and benefits (intensive)
6. Individual Development Accounts (IDA) (training)

Instruction designed to ameliorate barriers to employment is classified as a (1) b. other supportive service at the intensive or training level depending on the activity supported.

Basic skills instruction is classified as (2) short-term training at the intensive level. Short-term occupational or combined basic/occupational skills instruction of 24 hours or less is classified as (2) short-term training at the intensive level. Occupational and combined basic/occupational skills instruction of more than 24 hours in length is classified as (3) training tuition at the training level.

Training tuition payments may only be made to institutions that are named on the Eligible Training Provider List for specific programs also identified on that list. These tuition payments must be in the form of an ITA payment. All programs selected must also be in conformance with Memorandum #__-09, *Qualifying Demand Occupations*.

Many training programs require the acquisition of books and supplies for participation. Since such books and supplies may need to be procured from an entity other than the Eligible Training Provider, these expenditures are to be incurred, paid, tracked, and reported as (1) a. supportive services - books and supplies at the training level.

The ITA tracking and accounting system may be managed through a manual tracking system or as an automated electronic system developed and maintained by the Site Operator. In either case, ITA tracking requires individualized client records, with funding expenditures tracked by activity, and monthly statements on the balance of the account being issued to the participant. The accounting functions associated with this tracking will require a constant adjustment of obligated funds against available dollars. Separate ITA allocations have been projected for each Center, but adjustments across the two Centers are possible. ITA approval, tracking, and accounting will all be done by the Center Site Operators.

Additional Policy: WIA and/or ARRA-funded ITAs may only be used for registered participants in the WIA Title I-B and/or ARRA Adult and Dislocated Worker Programs.

WIA and/or ARRA-funded ITAs may be used for an individual who is employed provided that (1) s/he is eligible for and registered in either the WIA Title I-B or ARRA Adult or Dislocated Worker Program and (2) the ITA is needed to obtain or retain unsubsidized employment which will render the participant self-sufficient as defined by WDCSC.

ITAs may be used for jobs targeted outside of Snohomish County, as long as there is documentation of demand occupation in that area or a job offer and there is documentation of the participant's willingness to commute or relocate to that area if that area is a non-contiguous workforce development area.

Time Restrictions. There is no set time within the law required for ITA issuance and use. However, there is a requirement to document the need for an ITA to move a participant

between levels of service and that documentation must be present in both the Individual Employment Plan and the Career Tool Kit or Career Assessment Survey.

POLICIES FOR THE PROVISION OF SPECIFIC SUPPORTIVE SERVICES

1. Child/Dependent Care

Child/dependent care may be provided to a participant's child or parent while the participant is engaged in training or employment consistent with her/his IEP including transportation time. Priority will be given to single heads of household. Reimbursement will not be made for such care if the participant has an unemployed spouse at home. The participant must be the custodial parent or guardian of the child/dependent for whom such services are required. Child/dependent care services shall be paid to a licensed vendor unless the vendor is providing services in the participant's home. Exceptions can be made if it is clearly demonstrated that such care is not readily available due to the child's/parent's age or special needs or in instances when there is no appropriate care available in the area. Such exceptions are intended as a temporary measure to allow the participant to engage in program activities until acceptable care can be found. The payment shall be based upon actual costs while the participant is participating in and traveling to or from approved activities, as documented in attendance records, at rates which are not greater than current DSHS reimbursement rates. In instances where an hourly rate is being paid, the amount paid is not to exceed the maximum daily rate.

2. Transportation

Assistance may include bus tokens/passes, van pool expenses, ferry costs, or other public travel assistance determined reasonable and necessary for a given participant to participate in training and/or obtain and retain employment.

In instances where public transportation is not available or not feasible, assistance may be provided in the form of gas vouchers and/or car repairs when a private vehicle is used as the primary source of transportation to training or work.

If the repair of an existing vehicle addresses a significant barrier to employment, and such assistance will alleviate the barrier, then such assistance may be granted. To provide gas vouchers or pay for repair, the following conditions must be met. The participant must:

- have a current Washington State Driver's License,
- have valid insurance, and
- be the registered owner of the vehicle involved.

Additionally, the vehicle must be the primary source of transportation to training or work. Three bids on the repair **must** be obtained with the service being provided to the lowest bidder. In addition, only one car owned by the participant is eligible for repair.

Car insurance is limited to a one-time only payment for a one month period and when all conditions in this section apply.

Such requests must fall within established ITA limits.

3. Medical/Dental

Assistance is limited by established ITA limits for medical or dental services not covered by other insurance policies or by state labor and industrial insurance.

4. Clothing

Assistance is limited by established ITA limits for purchase of appropriate work clothing including uniforms required by an employer, safety gear, and suitable clothing for interviewing.

5. Emergency Services

Emergency Services include but are not limited to payments for overdue electric, home heating fuel and water bills; telecommunication costs; food; rent; and/or payment for temporary shelter. Refundable deposits of any kind may not be funded with support service dollars.

In instances where an overdue electric, home heating fuel, and/or water bill is being paid, it must be documented that the participant has contacted the local Low-Income Home Energy Assistance Program (LIHEAP) energy assistance provider and found eligible for services but unable to receive services due to a lack of program funds.

Telecommunication costs are subject to the following restrictions.

- It must be documented in the participant file that Community Voice Mail was explored as an option that has proven infeasible along with the reason.
- If supportive services are used for a cellular telephone, it must be documented in the participant file that this is the participant's only means of telecommunication. In such instances, only base costs may be paid.
- Internet costs will be based on a needs determination from the Site Operator. Preference will be given to participants who need such access to complete a training program, especially when the cost of internet access is less than the cost of child care enabling the participant to work on training program requirements at home.

Emergency services are limited by availability of funds under established ITA limits.

6. Certification, Screening and Testing

Union initiation; employment-related fees including but not limited to testing fees, drug screening, background checks; food handlers permits, security clearance, first aid/CPR certification, or finger printing; commercial and business licenses; and/or other fees if required by law and/or not paid for by employer to accept or maintain employment or participate in a WIA and/or ARRA activity. Union dues are only paid for the first month of employment: additional months require an exception for approval.

7. Out of Area Training and Job Search Expenses

Out of area training and job search expenses may include temporary housing and other incidental expenses which are necessary to enable individuals to participate in training or seek employment outside of their commuting area. Supportive services may be used to pay for actual expenses that are reasonable and necessary up to the established limit set for the ITA.

8. Relocation Assistance

Participants may receive relocation assistance within established PTA limits for moving to an area outside of the local commute area when they have a *bona fide* job offer related to training.

9. Tools/Books/Supplies/Equipment

Participants may receive assistance for the purchase of tools, books, supplies, and equipment related to training or necessary for accepting an employment offer within established ITA limits. A given tool or piece of equipment may only be purchased once with a preference being given to quality tools generally accepted in the workplace.

The need for any supportive service must be documented on the participant's Individual Employment Plan and in case notes as must all efforts to obtain the needed services from a non-WIA/non-ARRA source.

Additional Support Service Limitations

Supportive services may not be used to pay for the purchase, improvement, or maintenance of any asset (e.g. car payments or mortgage payments); to pay taxes; to pay past due fees, penalties, interest or other such expenses; to pay child support payments in arrears or otherwise; to pay for parking or moving violation tickets; to pay for bail or restitution; to settle an insurance claim; refundable deposits; or to pay for consumer debt. Computer hardware and software are considered assets are only allowable when it can be

verified that such hardware and software is a requirement of a training program. Such approvals are at the discretion of the Site Operator.

ADDITIONAL Support Service Center Site Operator Responsibilities

It is the responsibility of the Center Site Operator to review and approve all supportive services requests within established policies; to maintain a system of obligating and reobligating funds; to maintain a purchase order, A-19, or other similar system for procuring supportive services; to maintain a vendor reimbursement system; to track all supportive services expenditures by participant and service category; to ensure all record of request, approval, obligation, and provision of any supportive service for a given participant is maintained in the participant file; and to provide any and all Federal, State, County, and WDCSC monitors and auditors with access to such records given reasonable notice.

ADDITIONAL Support Service WDC Responsibilities

It is the responsibility of WDCSC to review and approve any supportive services request that does not fall within the guidelines or intent of this policy and therefore may not be approved by the Site Operator.