

**WORKFORCE DEVELOPMENT BOARD OF VENTURA COUNTY (WDB)**  
LOCAL POLICY BULLETIN #2015-15: Policy on the Eligible Training Provider List and  
Individual Training Accounts

Effective date: July 1, 2015  
(Original effective date: December 2013 [2010])

**SUBJECT:** Eligible Training Provider List and Individual Training Accounts

**PURPOSE & BACKGROUND:**

The Ventura County Workforce Development Board is one of 48 Local Workforce Development Areas designated by the Governor that are responsible for administering the services of the Workforce Innovation and Opportunity Act (WIOA) of 2014. The Chief Elected Official (CEO) of each LWDA appoints a Local WDB with a local membership similar in composition to the State WDB.

The Workforce Development Board of Ventura County is comprised of members appointed by the Ventura County Board of Supervisors. The members are selected from throughout the County and are responsible for policy and oversight of local program investments in workforce preparation. The WDB oversees the design, coordination and implementation of a training system dedicated to ensure that training is for jobs that are in demand and for the high-skill, high-wage jobs of the future.

The WDA emphasizes the goals of informed customer choice, performance accountability and continuous improvement. One of the primary means to achieve these goals is through the use of a system for documenting the availability of training programs.

Section 122 of WIOA requires the establishment of a list of vocational training providers eligible to receive funds for vocational training services provided to adults and dislocated workers and, in some cases, older youth. This Eligible Training Provider List (ETPL) is maintained by the State, and the information on programs is available statewide. Only programs that meet the specified criteria may remain on the ETPL and are eligible to receive Individual Training Account (ITA) funding through WIOA.

**POLICY:**

With the exception of certain types of customized and on-the-job training, only providers listed on the ETPL are eligible to receive WIOA funds through the Individual Training Accounts (ITA) described below. All providers and programs must be approved by an appropriate WDB.

**The definition of a program is:**

- One or more courses or classes that, upon successful completion, lead to:
  - A certificate, or associate degree, or baccalaureate degree
  - A competency or employer/industry skill recognized by DOL
- A training regimen that provides individuals with additional skills or competencies generally recognized by employers. Different programs may have differing goals,

geographic location, curriculum and mode of delivery (classroom, correspondence, Internet, etc.).

**Providers must meet one of the following criteria in order to list one or more programs, or courses, on the ETPL:**

- An institution of higher education that provides a program that leads to a recognized postsecondary credential (WIOA Section 122 (a)(2)(A))
- An entity that carries out programs registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat.664, chapter 663; 29 U.S.C. 50 *et seq.*) and approved by California’s Division of Apprenticeship Standards (DAS) (WIOA Section 122 (a)(2)(B))
- Another public or private provider of a program of training services, which may include joint labor-management organizations, and eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training (WIOA Section 122 (a)(2)(C):
  - Accreditation by an institution recognized by the Federal Department of Education or
  - Approval by the California Department of Education or
  - Approval by the Chancellor’s Office of the California Community Colleges or
  - Approval or exemption of the program by California’s Bureau of Private Postsecondary Education (BPPE)
- The Workforce Development Board authorizes the County of Ventura’s workforce administration staff to review and make determinations regarding the inclusion on the ETPL of new training program applications submitted by qualified vendors. The WDB retains the right to review and act on such training program applications.
- Participants may choose programs/courses listed and accessed via the internet for Ventura County or any other county or LWDA. Programs/courses may involve training in a classroom or online.
- Vendors and training programs may be recommended by workforce administration or operational staff, WDB members, the schools or providers themselves, or job seekers and employers.

**INDIVIDUAL TRAINING ACCOUNTS**

Under the Workforce Innovation and Opportunity Act training services for adults, dislocated workers and some youth will be provided primarily through an Individual Training Account (ITA) system. This ITA is established on behalf of the job seeker. The job seeker can then use the ITA to purchase training services from eligible providers on the Eligible Training Provider List, described above, after considering appropriate information in the following areas:

- Local labor market conditions and trends
- The job seeker’s own interests, aptitude and abilities relative to the local labor market as determined by an objective assessment
- The training vendors’ performance and cost information

The Workforce Development Board is responsible for the structure of, and the policies for, Individual Training Accounts. The parameters outlined below are designed and intended to maximize customer choice.

## INDIVIDUAL TRAINING ACCOUNT POLICY

An ITA may be offered to eligible adult and dislocated workers on the basis of available funds and individual assessments for training in demand occupations. Unemployed and employed workers may be offered an ITA.

- An ITA may be offered to any eligible, qualified individual, regardless of residency. When funds are limited, priority will be given to residents of Ventura County.
- The limitations on the funding available for training costs is as follows: The ITA will be limited to a maximum of \$7,500 for a period of up to twenty-four consecutive months. An ITA is not an entitlement. All alternative resources for securing funds for the training program must be exhausted before an ITA is issued. An ITA may be issued only for courses included on the statewide Eligible Training Provider List.
- The ITA is issued only once for any individual in a five-year period. The exceptions to this rule are:
  - - The career field no longer has a labor market demand as determined by the Employment Development Department (EDD).
    - The participant did not complete training due to extenuating circumstances. These are limited to ill health, family emergency, or other circumstances allowed by the training vendor that would entitle the participant to a full or partial tuition refund.
    - The training course selected was defective as determined by the appropriate accrediting agency.
    - A committee made up of operational staff will consider each case for exception. The committee's decision on granting an exception will be final.
- If the ITA is not used within thirty days of issuance for good cause as determined by the Employment Specialist, it will be cancelled. An ITA may be reissued at a later date, if all criteria are met. Modifications to an ITA may be considered on a case-by-case basis.
- The ITA can be issued only after basic services have proved ineffective in assisting the individual to obtain or keep a job.
- The process for approving an ITA is based on the informed choice of the participant. Participants shall choose a training program with the guidance and support of the WIOA Case Manager. An ITA can be issued only after the job seeker has provided written information to support an "informed choice." This information must include the following:
  - Current information about schools and courses
  - Comparable information about outcomes and costs for those schools and courses
  - Self-knowledge that includes an accurate assessment of skills, interests and aptitudes
  - Up-to-date labor market information, including the occupational outlook
  - Local information regarding opportunities for advancement within the chosen field
  - Local information about wages and working conditions
  - Allowable costs and support services for the choice

- The ITA will pay for costs only after other sources of funds, excluding loans, have been used first. The individual must demonstrate how, financially, s/he will be able to remain in training for the duration of the course.
- The ITA will be issued only after the participant has signed a WIOA Training Agreement that specifies his/her rights and responsibilities for participating in the ITA program.
- The ITA will pay only for tuition and related training costs for obtaining vocational skills from an eligible provider in an online or in a classroom setting. In all cases, attendance and performance will be monitored. Participants will be expected to demonstrate, in the application for their ITA, how this monitoring will take place—whether through an attendance list signed by the instructor, or through some form of online tracking.

## **PROCEDURES FOR AWARDING AN ITA**

### **To awarded an ITA:**

- The job seeker must have an Individual Employment Plan that substantiates the rationale for the career-training choices as well as the labor market demand.
- The job seeker must attend an orientation session that explains the Individual Employment Plan regarding the customer's rights and responsibilities for participating in the training service.
- The client must complete a Training Agreement document that includes, but is not necessarily limited to, the following information:
  - Cost/price analysis
  - Schedule
  - Technical skills of staff, facilities and materials
  - Information on the career outlook
  - Course prerequisites
  - Book list, tools, supplies, training materials/kits, *etc.*
  - Job placement information
  - Wage information
  - Type of completion certificate granted
  - Skills expected to be achieved
  - Potential jobs and businesses that employ people with similar skills (3 informational interviews)
- The participant must complete a training budget that includes monthly income, any scholarships or other forms of revenue, monthly expenses and expected training costs
- The job seeker's ITA must have the approval of the WIOA program manager or designated program coordinator in order to start the training.

### **To maintain an ITA:**

- The job seeker must be making satisfactory progress at each point designated in the Training Agreement.
- The school must verify this progress to the job seeker's Employment Specialist, using the designated form.

- The job seeker must contact his/her WIOA Case Manager at least once a month for the duration of the training, verifying satisfactory progress. This contact may be by telephone, email, U.S. mail, or in-person appointment as agreed upon with the WIOA Case Manager. The job seeker may already be or become employed for the duration of the ITA.

**To modify an ITA:**

- The job seeker or vocational school must submit justification that includes the reason for the modification and the terms of the modification.
- The WIA case manager must approve the justification.

**To appeal a decision to award or modify an ITA:**

- The job seeker must submit a letter stating the reason for the appeal.
- The WIOA program manager or his/her designee shall hear the appeal.
- The decision of the WIOA program manager or designee is final.

**Sanctions for not completing an ITA as agreed upon in the Training Plan:**

- The job seeker must submit a letter stating the reasons for not completing an ITA.
- If a committee of WIOA program coordinator and staff consider the reasons sufficient, the ITA can be discontinued with no further action.
- If the reasons are not considered sufficient, the ITA will be discontinued; and the job seeker will be ineligible for another ITA for five years following the date of the issuance of the initial ITA. Such action will be taken on a case-by-case basis and will be reviewed and approved by the WIOA program manager or designated WIOA program coordinator. In addition, workforce administration may seek the restoration of any and all direct costs associated with the training, to include tuition, books, supplies, equipment and support services. This should be done after an analysis of the cost of recovery versus the expected recovery amount. No further action will be taken if the cost of recovery exceeds the expected recovery amount.

**RESPONSIBILITIES FOR MANAGING AN ITA**

**WIOA program staff will:**

- Assist in the development of an Individual Employment Plan
- Inform the participant of options for financial aid
- Sign the job seeker's Training Agreement
- Authorize all necessary training expenses and supportive services during training, using the procedures described for these purposes
- Document all other potential and actual financial resources used for the selected training
- Track all expenses against the ITA
- Verify that the course at that school at that location for which the ITA is being awarded is on the Statewide Eligible Provider List
- Track all progress of the participant through the course paid by the ITA
- Complete all necessary documentation for client reporting via electronic case management system

- Follow-up on the outcomes of each participant who has been authorized the use of an ITA, using the procedures described for these purposes
- Verify that the participant is enrolled in training in the WIOA tracking and reporting system
- Verify that the participant has met all of the pre-award conditions: *i.e.*, attended the orientation, completed the training research and the budget and signed a Training Agreement
- Assign a number order with payment amounts and payment points that correspond to the agreed-upon deliverables described in the participant's Training Plan
- Issue the training order to the training vendor

**Workforce administration will be responsible for the following:**

- Coordinate all administrative activities involving the initial approval and subsequent eligibility determination process associated with listing course(s) on the ETPL
- Once the training course appears on the ETPL website, create, with an eligible provider, a Master Agreement that includes necessary assurances for establishing an ITA

**The Training Vendor will:**

- Sign the Master Agreement
- Sign a Training Plan for each individual referred participant
- Fill out, sign and return each purchase order at completion of the agreed-upon deliverables
- Report all training progress, attendee and program completion

**PROCEDURE FOR AMENDMENTS TO ETPL & POLICIES**

- The Policies and Procedures herein may be amended by the unilateral action of the Workforce Development Board in accordance with procedures in its Bylaws.
- Any and all amendments to these Policies and Procedures must be executed in conformity with the statutory provisions of the Workforce Innovation and Opportunity Act and will be consistent with the principles of maximizing customer choice, performance accountability and continuous improvement.

**INQUIRIES:**

Inquiries regarding this policy can be addressed to the WDB administrative staff: 805-477-5306.