



## Policies and Procedures

<b>SECTION:</b> Program Operations	<b>POLICY #</b> OPS-03	<b>PAGE</b> 1 of 11
<b>TITLE:</b> Individual Training Account (ITA, Budgeting and Fund Coordination Policy)	<b>REVISION DATE:</b> 11/01/2024	
<b>SUPERCEDES:</b> OPS-03		<b>Dated:</b> 08/01/2024

**DISTRIBUTION:** CareerSource North Central Florida (CSNCFL) Staff and Service Providers

### **PURPOSE:**

To establish local operating policy and procedures for the usage and issuance of Individual Training Accounts (ITAs).

### **POLICY:**

Individual Training Accounts (ITAs) shall be utilized to provide training services to eligible Youth, Adult and Dislocated Worker Workforce Innovation and Opportunity Act (WIOA) and Welfare Transition Program (WTP) customers. The ITA will be developed after consultation with the Career Navigator, Youth Navigator or other applicable staff. Limitations on ITAs exist regarding eligibility, suitability, assessment, program choice, coordination of funds; duration, total program cost, support services, and needs based expenses. Current funding streams in CSNCFL finance systems include In-School Youth, Out of School Youth, Adult, Dislocated Worker, TAA and WTP. Additional funding may be supplemented through awarded State and Federal grants.

#### **1. WIOA ENROLLMENT**

Career Seekers are referred from CareerSource North Central Florida to an educational provider, or training provider. Also, career seekers may be referred from the educational provider, or training provider to CSNCFL.

Occasionally students are referred to WIOA for additional training assistance and this is identified during the school's admissions process. Customers may also be referred to explore training opportunities by CSNCFL staff while engaged in other CSNCFL programs. In all cases the WIOA enrollment process remains the same.

#### **A. WIOA Staff Assisted Application Process**

All career seekers referred/interested in training services must have already completed the preliminary steps for staff assisted services for WIOA enrollment as follows:

- Universal CareerSource NCFL Services Application
- Attend a WIOA Orientation, held once a week

Upon completion of the above activities, customers will be referred to meet or schedule an appointment with a CSNCFL WIOA Career Navigator (CN) or Youth Navigator. The WIOA CN will review the Area Targeted Occupation List (ATOL) with the Applicant. If the Applicant is interested in pursuing training opportunities on the Targeted Occupation List, the WIOA CN will scan the completed application documents into Atlas. Then the WIOA CN will assist the customer in completing the Assessment for Training Enrollment as specified in Item (4) below.

### **2. ELIGIBILITY**

20 CFR section 680.210(c) states that WIOA training services must be provided when other sources of grant assistance are unavailable to the customer.

All recipients of an ITA from CSNCFL must be eligible for WIOA services as described in 20 CFR section 680.100 through 680.350, or an active, open and participating customer of the Welfare Transition Program and must be residents of Alachua, Bradford, Columbia, Dixie, Gilchrist or Union counties. A WIOA Eligibility Review Checklist must be completed with required approvals and signatures before entry into the State's MIS system.

### **3. PROGRAM CHOICE**

20 CFR section 680.210(b) stipulates that approved training services are to be directly linked to occupations in demand in the area as established by the local area board and as published on the CSNCFL Area Targeted Occupation List (ATOL). The CSNCFL ATOL is available at the Career Centers in Alachua, Bradford, Columbia, Dixie, Gilchrist or Union counties, as well as available on the [careersourcencfl.com](http://careersourcencfl.com) webpage. The Area Targeted Occupation List (ATOL) is derived from information gathered from the Florida Education and Training Placement Information Program (FETPIP) data, State Labor Market Information and local data analysis as set forth in CareerSource NCFL's Policy *WIOA Eligible Training Provider List*. Customers may select a program and training vendor that has been approved and is listed on the ATOL. This list will show currently available programs and the associated training vendors approved to provide such training utilizing local WIOA, WTP, and Trade Adjustment Act (TAA) funds.

The number of individual program enrollments through WIOA or WTP may be limited

based on data reviewed during the ATOL development process. For example: the number of current training completers in comparison to employment projections as listed in state labor market information (LMI) may indicate that opportunities for additional training completers may be limited if enrollments are allowed to continue. In cases such as this the number of ITAs issued will be limited for those occupations. This limitation will be at the discretion of the CEO.

Eligible customers must also exhibit the skills, ability and competency to successfully complete a training program prior to WIOA enrollment. This is often referred to as 'suitability'. Customers with existing certifications and degrees may be deemed to have marketable skills and may be referred to Individualized Career Services prior to enrollment in training if it cannot be determined that training is required for the customer to gain employment.

ITAs may be established for programs up to the attainment of a two-year degree. ITA's may be established for customers enrolling into training for a Baccalaureate degree assuming that CSNCFL funds were not used for the attainment of the preceding Associate degree. Funding for tuition beyond an Associate degree may only be granted after approval from the CEO. At this time no assistance can be granted for training above the Baccalaureate level. An ITA Request form must be completed and all approvals and signatures secured before the ITA is issued for training.

#### **4. ASSESSMENT FOR TRAINING ENROLLMENT**

The purpose of training is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. The purpose of assessment is to help customers and program staff make decisions about appropriate employment goals and develop effective service strategies for reaching those goals. The cornerstone to assisting our customers is providing meaningful advice and recommendations when assisting them in selecting training programs or appropriate employment. Various methods may be used to determine the needs and outcome for each customer.

Although CSNCFL staff is responsible for ensuring that any educational, training or supportive service provided to customers is appropriate and necessary to meet that customer's employment goal, customers must be afforded choice in setting goals, developing employment strategies and choosing providers. CSNCFL staff assumes the role of career navigator and not decision maker.

Detailed below are the recommended methods to assess a customer when enrolling them into training services. Before a customer is referred to an educational partner, the following tools should be used to help determine the customer's ability to benefit from the identified training activity, and if a successful outcome from the training program is likely for the customer. The assessment process used by staff and partners to assist customers in choosing and identifying appropriate assistance varies by service access point and program specific service levels. The Career Navigator will determine the assessments needed to best determine eligibility and suitability.

- 1. WIOA Initial Assessment:** All WIOA enrollments should begin with an Initial Informal Assessment. This assessment utilizes a standardized form that helps the Career

Navigator understand the customer's individual needs and the level of service required to best assist them in achieving their goals. This Initial Assessment is used to draft the customer's Individual Employment Plan (IEP) and to set short- and long-term employment and educational related goals.

- 2. WTP/SNAP Initial Assessment:** The WTP Initial Informal Assessment takes place during an online application process. The results of this informal assessment are documented in the participant's Individual Responsibility Plan (IRP). The IRP helps with the development of long/short employment and education related goals for the participant.
- 3. Test of Adult Basic Education (TABE):** The TABE test is an indicator assessment. The results of the TABE test are representative of grade level attainment up to 12<sup>th</sup> grade. Most educational provider programs require that a training enrollee test at a specific level in order to successfully meet their program requirements. The results of this test assist Career Navigators in determining whether the customer needs remedial training prior to enrollment.
- 4. EF Interest Profiler:** Examines the customer's interests to determine what occupations may be a good fit. The Interest Profiler does not assess specific aptitude but should be used as a self-discovery tool as well as an indicator of true interest in particular occupations.
- 5. EF Work Values Indicator:** Assesses what principals or values are most important to the customer and suggests occupations that match the importance levels. For example: A customer that rates personal interaction as a high importance would not be suggested for occupations that would isolate that customer such as a backroom position.
- 6. Career Clusters:** An online assessment tool that measures interests and skill levels. It also recommends careers that the student most likely will excel at. The tool also recommends courses or training programs related to that career.
- 7. eSkill:** This line of assessments tests specific skills and act as a solid indicator of current knowledge possessed in certain topics. There are also several behavioral assessments that indicate motivation and 'soft-skill' strengths.
- 8. Florida Ready to Work:** This assessment helps to determine if a customer possesses core competencies in Applied Mathematics, Locating Information and Reading for Information.

#### **A. Assessment Proctoring**

The key to obtaining useful assessment data is to proctor the assessment in an environment that provides comfort, concentration and security. Test takers must feel comfortable and focused when taking any assessment. Each CSNCFL office where proctored assessments are conducted will arrange an assessment area that is quiet, comfortable and away from the usual noise and distractions of the office. Distractions

can alter the results and make the assessment invalid in some cases. Several of the assessments listed in Section 3 are self-paced and may be completed anywhere that internet access can be established and do not require official proctoring. These assessments include:

- EF Interest Profiler
- EF Work Values Indicator

Formal assessments that require staff proctoring are:

- **TABE:** The TABE assessment is timed and may include several parts such as Reading and Math.
- **Career Clusters:** Online aptitude and assessment, career inventory.
- **Florida Ready to Work:** The Florida Ready to Work assessment consists of three components: Applied Mathematics, Locating Information and Reading for Information.

The following exception will have a MIS case note in the customer's case file detailing the circumstances in which formal assessment was not required:

- Training applicants as referred by educational partners that exhibit positive educational achievement (examples include: Students that have reached training benchmarks, medical students that have successfully completed a majority of their clinical coursework, students that have nearly completed their program requirements but need additional assistance to complete their program and exhibit acceptable academic performance or customers that have achieved acceptable scores on an entrance exam as proctored by an education partner.)

## **5. SUITABILITY DETERMINATION**

Enrollment into training must not only factor in eligibility but suitability as well. CSNCFL utilizes the 'Whole Person' approach when determining suitability. Career Navigators will use a combination of the Career Scope assessment, the Initial Assessment, EF Interest Profiler, EF Work Values Indicator, eSkill, Florida Ready to Work, TABE scores, educational provider administered entrance exams or assessments and information gained throughout career counseling sessions as the baseline for determining the customer's suitability for enrollment.

The Career Clusters assessment crosswalks the customer's scholastic aptitude to requirements of the requested training occupation. This assessment will be used as the primary indicator of success. Results of this assessment will be combined with those of other assessments conducted when determining suitability through the 'Whole Person' approach.

Full suitability is achieved when:

1. The customer attains the appropriate levels on the Career Clusters and TABE assessments (or other admissions test as may be used by an educational provider); and
2. Meets eligibility requirements and complies with all data and intake procedures as

required under WIOA, WTP, TAA, WT or SNAP.

Customers deemed unsuitable will be notified (by their CSNCFL CN) of this determination no later than two business days upon determination of unsuitability. The WIOA CN will document the denial with a case note in the Customer's file.

## **6. DURATION**

ITA's will be reviewed, re-written and renewed with the customer on a yearly basis depending on availability of funds. Customers must be notified that funding can only be allotted for the current program year. Continuance of funding will be reviewed each program year.

It is the intent of this policy that each customer who is determined eligible has the opportunity for training if training is deemed necessary for the customer to obtain employment. This opportunity for training includes a commitment to a specific training program that includes the completion of the training and employment in a related field as a final goal.

The demand for training is always greater than the funding available. CSNCFL will pay for training for a customer **only once** in order to ensure that another customer will have the opportunity to receive training. As such, each customer shall be limited to one ITA unless conditions exist which prohibit the completion of the agreed upon program. CSNCFL Chief Executive Officer (CEO) shall, at their discretion, grant approval of the issuance of an additional ITA.

At the point of eligibility determination, it is the responsibility of the Career or Youth Navigator to determine whether or not the customer has received prior training assistance from CSNCFL. Customers that have been served prior by Workforce Investment Act (WIA) or Workforce Innovation and Opportunity Act (WIOA) funding must complete a statement detailing the reason why they are requesting additional tuition assistance. All customer statements will be reviewed by the CEO. Approval or Denial will be given in writing to the Career or Youth Navigator detailing the decision.

ITAs may be issued/renewed for a time period equivalent to the time required to complete a two-year degree. It is not the intent of this policy to imply that a limit of twenty-four (24) months is strictly established. Additional training requirements should be considered when establishing a timeline for completion (pre-requisites, remediation, testing, etc.).

## **7. COORDINATION OF FUNDS**

WIOA requires the coordination of training costs with funds available under other Federal programs. To avoid duplicate payment of costs when a customer is eligible for both WIOA and other assistance, including a Pell Grant, 20 CFR section 680.230(b) requires that program operators and training providers coordinate by entering into arrangements with the entities administering the alternate sources of funds, including eligible providers administering Pell grants. All sources of funds, excluding loans, shall be considered in determining a customer's overall need for WIOA funds. **Participation in a training program funded under WIOA may not be conditioned on applying for or using a**

**loan to help finance training costs.**

**20 CFR section 680.150(a) requires at a minimum, that Basic Adult Career Services be made available to all individuals seeking services in the One-Stop Delivery System.**

A primary focus of our customer training and support funds shall be directed at Dislocated Workers, Adults, and Out of School Youth who meet priority of service for: On the Job Training, Customized Training (Custom Business Training), Internship, Work Experience, Apprenticeship and classroom/online training programs.

Additionally, it is often determined through assessment that short term, certificate-based training is a valuable resource for customers that need additional assistance to re-enter the job market. Quite often, during low cycles within the economy job positions and duties are compressed to make up for staffing short falls, or due to long term unemployment, a customer's skills may become antiquated. This often leaves talented customers lacking specific market required skills that can be gotten through short-term training. Examples of such training would include office skills, keyboarding, MS Word, Access, Excel or PowerPoint. These short terms, skill-based trainings should be made available to customers when they are determined to be needed to help the candidate re-enter the workforce. Prior approval is required for all training that is certificate based (skill based) and is outside of the regular occupationally based ATOL. These courses may be approved by the CEO.

When the financial aid package together with the funds requested from the local workforce development area are in excess of the required funds needed to meet the direct training and supportive service needs of the customer, CSNCFL will coordinate with the educational partner to obtain reimbursement for additional funds applied to the student's account.

20 CFR section 680.230(c) permits a WIOA customer to enroll in a training program with WIOA funds while an application for Pell Grant funds is pending, but requires that the local workforce development area be reimbursed for the amount of the Pell Grant used for training if the application is approved. Since Pell Grants are intended to provide for both tuition and other education-related costs, the Rule also clarifies that only the portion provided (with Pell funds) for tuition is subject to reimbursement.

It is important to note that the Pell Grant is not school-based; rather, it is a portable grant for which preliminary eligibility can, and should, be determined before the customer enrolls in a particular school or training program. The application (or access electronically to it) for determining eligibility and ultimately the amount of the grant, should be readily available at all CSNCFL office locations. CSNCFL staff should be prepared and knowledgeable in the application process and should provide assistance in the completion of these "gateway" financial aid applications. The application for PELL grants is available online through the Free Application For Student Aid (FAFSA) website at: <https://fafsa.ed.gov>.

## **8. DOCUMENTATION**

It is mandatory that Career Navigators document fund coordination each program year, through the use of:

- the customer's financial aid award letter or SAR (Student Aid Report),
- Statements on the Customer Employment Plan (IEP) or Individual Responsibility Plan (IRP) that WIOA or WTP funds are awarded in coordination with other financial assistance when appropriate.
- A copy of the published Cost of Attendance provided by the training provider in the case where such cost is utilized to calculate financial and support assistance.

**All of the items listed above are necessary to document fund coordination.**

In the cases where a program is not eligible for Pell or other financial aid assistance, documentation shall be in the form of correspondence on the training contractor's letterhead, a form letter signed by an agent of the training contractor or a copy of an e-mail from an agent of the contractor or other relevant documentation that specifies that Pell funding is not available and that the customer is/is not eligible for any other assistance that the contractor has available. The letter must include the specific program(s) for which there is no funding or be a copy of the FAFSA confirmation page stating that the customer is not eligible for funding. Customers that are not eligible for Pell when applying for a Pell eligible program will need to detail the reason they are NOT eligible with the Career Navigator. Customers that are not eligible for PELL due to default on federal student loans will not be eligible for WIOA funding. All decisions regarding funding should be clearly case noted in the customer's file. Funding is dependent on eligibility and suitability and is awarded strictly at the discretion of CSNCFL staff and service providers.

## **9. DOCUMENT STORAGE**

All of the documents required to demonstrate fund coordination must be located in the customer's ATLAS electronic records file.

## **10. COVERED COSTS**

The Career or Youth navigator shall work with the WIOA or WTP customer to calculate the total funding resources available as well as to assess the complete "education and education related costs" (training and supportive services costs) incurred if the customer is to complete the chosen program. This also ensures both that duplicate payments of training costs are not made and that the amount of funded training is not reduced by the amount of Federal student financial assistance in violation of 20 U.S.C. 1087. CSNCFL's funds should be used to cover expenses that cannot be covered through other funding sources. Other funding sources should be used to cover those "cost of attendance" needs which cannot be funded through CSNCFL ITAs.

**Due to the above, CSNCFL funds, in most cases, should be prioritized to cover the costs of tuition, fees and licensing/testing costs, and other materials or equipment required for the training program that cannot be covered by another source.** The customer will be made aware of CSNCFL's right to amend the ITA based on changes in other available training/funding resources as well as available funding.



The program costs are limited to tuition, books, fees, and equipment required to successfully complete the training program. Living expenses such as housing, utilities, transportation, etc. are not covered under the program costs. Living expenses may be covered, if funding is available, under supportive services, if documented as a needs-based service as required.

CSNCFL reserves the right to limit the amount of funding for an ITA. The funding limit for any approved training shall not exceed the published in-state tuition rate at a local, public educational institution or community college. Funding may exceed the published in-state tuition rate at public schools when funding is being coordinated for education at a private institution with higher rates.

Students that wish to attend private schools will only be funded (with exception) at the local, public educational institution's credit hour rate for each credit hour of instruction that is approved on the ITA. Customers attending private institutions will also be asked to show documentation or proof of ability to pay the additional expenses that are not covered by WIOA training services. This documentation must be stored in the customer's electronic file for future reference and will establish the customer's commitment to completion of the program.

#### **11. ESTABLISHED COST CAP**

At this time CSNCFL does have an established cost cap for training related expenses (tuition, books, fees) due to limited funding, set at \$5,000 per individual per Program Year, which is based upon average tuition costs at public post-secondary institutions.

**Current cap amount:** \$5,000 per individual per Program Year

#### **12. OTHER TRAINING COSTS**

Those materials necessary for successful completion of the course not already covered by other sources can be provided via purchase order or CSNCFL issued prepaid debit card. These costs shall be included as part of the customer's overall ITA budget and will be made available depending on available funding.

#### **13. SUPPORT SERVICES**

Support Services will continue to be paid and documented as outlined in the respective policies and as a needs-based service.

### **PROCEDURES:**

All CSNCFL ITA's and additional support services are documented and filed in the customers' file in Atlas. It is the responsibility of the Career or Youth Navigator to create appropriate financial documents with the customer. The ITA and PO forms require the Career Navigator AND the customer to sign the documents showing agreement of the terms of continued assistance and issuance from the agreement. ITA and PO documents

should be dated to expire forty-five days from date of issuance in order to allow deobligation of unused funds.

## **BUDGET DEVELOPMENT**

A. The Career or Youth Navigator needs to work with the participant to calculate the total funding resources available as well as to assess the full education and education related costs incurred if the participant is to complete the chosen program. This ensures that duplicate payments of training costs are not made and that the amount of WIOA funded training is not reduced by the amount of Federal student financial assistance in violation of the Higher Education Act.

- The exact mix of funds should be based on the availability of funding with a goal of ensuring that the costs of the training program the customer selects are fully paid so that the training can be completed successfully.
- The training program costs include tuition, books, fees and equipment or supplies required to complete the training program successfully.
- A good starting point is to examine the training institution's annualized cost of attending school full time. It should be noted and taken into consideration that this figure, used for financial aid purposes, can be significantly lower than the actual cost of living. Areas that should be closely reviewed, but not limited to, are:

- Resources/income (saving, wages, reemployment payments, cash assistance, etc.)
- Financial aid (grants, scholarships, other program support such as cash assistance, food assistance, etc.)
- Other training related expenses (books, supplies, uniforms, transportation, childcare, housing and utilities, etc.)

- Tuition expenses are to be capped at the maximum allowable amount. The maximum allowable amount is only considered when a customer is attending a private school. The maximum allowable amount will be based on the total required credit hours at the current published in-state rate of other local, public education entities.

## **NOTE:**

- Staff should consider all available sources of funds, excluding loans, in determining a customer's overall need for WIOA funding, which may not be conditioned on applying for or using a loan to help finance training costs.
- Reducing the amount of WIOA funds by the amount of awarded Pell Grant funds is not permitted.
- WIOA regulations delineate the responsibility to make arrangements for reimbursement of WIOA funds used when the Pell Grant covers the same training costs, but notes: "Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses." Please note that education-related expenses are those associated with housing, food, other living expenses, books & supplies.

Veteran and Veteran Spouses:

- Will not be precluded from receiving WIOA funded services due to their entitlement to education benefits
- Are not required to coordinate their entitlements to education benefits with WIOA funds.
- Will not be required to exhaust their entitlement to educational benefits prior to receiving WIOA funded services.

**Official Signature**

**Phyllis Marty**  
**CSNCFL CEO**