

INDIVIDUAL TRAINING ACCOUNT (ITA) POLICY

Eligible Training Provider and Programs List

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Background

Individual empowerment through informed customer choice is one of the guiding principles of the Workforce Innovation and Opportunity Act (WIOA). One of the primary mechanisms for providing customers with increased choice and flexibility when it comes to accessing training under the WIOA is through the Individual Training Account (ITA) Program. The ITA Program allows customers to access a wide variety of approved training programs from qualified training providers. Customer choice is maximized by virtue of both the diversity and sheer numbers of different programs and training opportunities that are available to meet the needs of eligible customers.

The ITA Program is operated in accordance with Sections 680.300, 680.310, 680.320, 680.330, 680.340, 680.350, 680.400, 680.410, 680.420, 680.430, 680.450, 680.460, 680.470, 680.480, 680.490, 680.500, 680.510 and 680.520 of the WIOA Final Rules and Regulations and related guidance provided by the Virginia Community College System (VCCS) Workforce Development Services Division, to include VWL No. 16-06. The Program is made available at the point at which a customer's employment needs and goals cannot be met without the receipt of training services based on an assessment of their knowledge, skills, abilities, work history and employment barriers. Since access to the ITA Program can only occur following a customer's receipt of assessment services and determination of need, a strong case management and career counseling infrastructure must be present to coordinate all of the various aspects of service intervention, in order to support the overall goal of meaningful unsubsidized employment and recognized postsecondary credential attainment for the customer.

ITA Initial Eligibility Application Process

The ITA Initial Eligibility Application Package is posted on the Opportunity Inc. website at www.opp-inc.org on an ongoing basis. The Application Package includes the VCCS prescribed Training Provider and Training Program Application Forms, in addition to other submission requirements. The full ITA Application Package can be viewed on the website.

Interested training providers may propose training programs for Initial Training Provider/ Program Eligibility at anytime during the program year. Opportunity Inc. staff reviews submitted applications for completeness and compliance with applicable requirements. Where submitted applications do not fully meet the applicable requirements and/or are incomplete, staff will contact the proposing training provider for resolution. The application will not be moved forward for consideration until resolution is complete. Where submitted applications are complete and in

compliance with the applicable requirements such will be moved forward for program selection consideration.

Initial Training Provider/ Training Program Eligibility Selection Process

The Hampton Roads Workforce Development Board (HRWDB) in consultation with the HRWDB Workforce Services Committee (WSC) selects training programs for inclusion on the HRWDB Approved ITA Programs List. Selection is based on a review of submitted applications by the WSC and the formulation of program selection recommendations for the HRWDB to consider at their next regularly scheduled meeting. The WSC considers such factors as capacity to provide the proposed training services; performance outcomes; training credential recognition; organization qualifications; labor market demand data; training curriculum accreditation; and, the skills to be obtained from the training program.

Training providers whose proposed training programs are selected by the HRWDB for inclusion on the HRWDB Approved ITA Training Programs List will be notified by letter and an ITA Vendor Agreement with Opportunity Inc. will be executed. The ITA Vendor Agreement will outline the terms, conditions, stipulations and requirements under which Opportunity Inc. may purchase training services from the training provider. In addition, it will outline the performance data tracking and reporting requirements related to the Opportunity Inc. participants who receive training services. Training programs selected for inclusion on the List and will remain on such for one (1) year, unless otherwise removed by Opportunity Inc. for cause. Training programs selected by the HRWDB will be included on Eligible Training Provider and Programs List for Virginia.

Those training providers whose proposed training programs are not selected will also be notified by letter and informed of the HRWDB Reconsideration Process that is available for those whose proposed programs were not selected for inclusion on the HRWDB List. Training providers must first exhaust their reconsideration option with the HRWDB prior to going forward to the VCCS Process.

Continued Training Provider/Training Program Eligibility Process

Following the completion of one (1) full year of initial eligibility each approved training provider program will be reviewed to determine continued eligibility for inclusion on the HRWDB Approved ITA Programs List. As part of this process, training providers will be required to certify program performance on an annual basis for those participants who were funded by Opportunity Inc. Training providers must develop methods to collect, certify and report such information. This information will provide for the calculation of the following metrics:

1. Training Completion Rate (must meet or exceed 50% by VCCS Requirement)
2. Credential Attainment Rate (must meet or exceed 65% by VCCS Requirement)
3. Entered Employment Rate*
4. Post Training Earnings*

* The minimum threshold for these metrics will be determined by the HRWDB WSC on a program year basis, in consideration of local labor market information and related DOL Performance Measures negotiated performance levels.

The aforementioned participant data and related rate calculations will be validated by Opportunity Inc. In addition to consideration of participant performance outcomes, other factors that will be considered for continued eligibility will include: organizational structure; operational capability; any participant complaints or formal grievances; credential recognition; curriculum contents; training delivery method; invoicing or reporting issues; State Eligible Training Provider Reports provided by the VCCS; and, any other issues related to the delivery of training services under the ITA Vendor Agreement.

The HRWDB WSC will review training programs for continued eligibility and make recommendations to the HRWDB for continued inclusion on the HRWDB Approved ITA Programs List. Training programs authorized for continued eligibility may operate for an additional one (1) period unless otherwise removed by Opportunity Inc. for cause. Thereafter, continued eligibility will be determined on an annual basis in accordance with the above. Training providers whose training programs are approved for continued eligibility will be notified by letter and their ITA Vendor Agreement will be modified accordingly. Those who are not approved will also be notified by letter and the aforementioned Reconsideration Process will be available.

In the event that a training provider program(s) is not re-certified, participants who are currently enrolled and active in authorized training services will be allowed to continue through to the completion of their approved training plan, as long as they actively participate.

Training providers that wish to propose a new training program(s) at the time of re-certification must propose such in accordance with the Initial Eligibility Application Process.

Opportunity Inc. WIOA Training Funds Limitation/ Approved Program Revisions

The maximum amount of WIOA funds that an individual customer may receive for ITA training tuition and other necessary training related costs is established by the HRWDB WSC, in consultation with Opportunity Inc. This amount is reviewed by the WSC as needed and changes are made when warranted. Currently that amount is up to \$5,000, in total. WIOA funds are to be used for customer training when other forms of federal grant assistance, such as PELL Grants, are not available to the customer. In cases where the cost of training exceeds \$5,000, a financial plan is to be developed to identify how the full cost of training will be funded.

Revisions to existing approved training programs may be authorized where curriculum changes are needed in order to reflect dynamic industry training standards and/or requirements in support of existing and/or new industry recognized credentials. This can be accomplished administratively at any time during the ITA Vendor Agreement performance period without the need of a formal application process. Any revisions to existing approved programs must be approved by Opportunity Inc. and in no case will the cost exceed the maximum WIOA training funds limitation.

Virginia Eligible Training Provider and Programs List Use Option

Once a training provider's training program(s) is approved by any Local Workforce Development Board (LWDB) in Virginia, that program(s) is included on the Virginia Statewide Eligible Training Provider and Programs List. Other LWDBs may purchase training from that training provider as long as the applicable program(s) remains in good standing on the Virginia Statewide List, without the training provider having to go through an additional application process.

Opportunity Inc. may choose to enter into an ITA Vendor Agreement and purchase training from a training provider who is on the Virginia Statewide List, in order to best meet the needs of a specific customer, in exception situations, at its sole discretion. In that regard, the following process must be followed prior to using a training provider's program(s) from the Virginia Statewide List:

1. The training program is not available from any training provider in good standing on the current HRWDB Approved ITA Programs List and has been verified to be current on the Virginia Statewide List. The timing of training services delivery in regards to the needs of the customer will be considered in relation to the determination of availability.
2. The training program's occupational area shows satisfactory projected labor market demand, as determined by Opportunity Inc.
3. The training program's curriculum, training delivery capacity and recognized training credential is verified and a satisfactory site visit, as warranted, is conducted by Opportunity Inc.
4. The training program after meeting the requirements set forth under items 1, 2 and 3 above, is reviewed by the Opportunity Inc. Workforce Services Officer and approved. A training program that does not meet the requirements under items 1, 2 and 3 will not be approved.
5. The training provider enters into an ITA Vendor Agreement with Opportunity Inc.

Note: Training programs that are purchased by Opportunity Inc. via the Virginia Statewide List will only be authorized for specific individual customers and will not be included on the HRWDB Approved ITA Programs List as eligible to receive ongoing customer referrals and additional vouchers. Being included on the Virginia Statewide List does not guarantee that a program(s) will be purchased by Opportunity Inc. The Reconsideration Process option is not available to programs not selected from the Virginia Statewide List by Opportunity Inc.

Out of State Training Providers Use Option

In order for a customer to obtain WIOA funded training services from an Out of State training provider, the training provider's program must be currently included on another States Eligible Training Provider and Programs List. Approved training programs in other States can be located at <http://www.servicelocator.org/program>.

Approval for the use of an Out of State training provider's program will follow the process outlined above for the use of the Virginia Statewide List. In the event that an Out of State training provider is used, a detailed case note that explains why such was used must be entered into the VaWC and sufficient data must be obtained from the training provider in order to enter the training program into the VaWC.

Registered Apprenticeship Process

In accordance with Section 680.470 of the WIOA Final Rules and Regulations, Registered Apprenticeships are automatically eligible for inclusion on the Eligible Training Provider and Programs List. Opportunity Inc. will obtain the required information needed to enter the training program into the VaWC. The training program information will be verified with the Virginia Department of Labor and Industry (DOLI), in writing, and maintained.

A Registered Apprenticeship Program may remain on the Virginia Statewide List as long as it remains registered and recognized with DOLI or until a Registered Apprenticeship Program sponsor requests to have a Program removed. Registered Apprenticeship Programs are not subject to the State mandated performance requirements.

VaWC Data Entry

Opportunity Inc. will ensure that the required data elements related to the initial eligibility application, continued eligibility and performance information regarding approved training provider training programs are entered into the VaWC. Once the initial eligibility application is completed, reviewed and approved by the HRWDB, the information will be entered into the VaWC within fourteen (14) business days, unless otherwise warranted. This will include training provider training programs that are not approved by the HRWDB. In addition, Registered Apprenticeship Program information will also be entered into the VaWC.

The Opportunity Inc. Workforce Services Officer will have the primary responsibility for the overall ITA Program. VaWC data entry will be performed by the Opportunity Inc. MIS Technician, as directed by the Workforce Services Officer.

ITA Program Records Retention

Opportunity Inc. will maintain initial eligibility applications; Registered Apprenticeship Program information and related DOLI verification documentation; continued eligibility and performance information; records regarding training provider related complaints and actions taken on those complaints; and, other required records and documents, for a minimum period of three (3) years.

