



Montana Department of LABOR & INDUSTRY

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2 **Division: Workforce Services Division**
3 **Category: WIOA**
4 **Effective Date: 04/30/2018**
5 **Last Revised: January 1, 2020**
6 **Policy No.: 14-18**

Individual Training Accounts (ITA) Policy

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8 **Background:** Individual Training Accounts (ITAs) are payment agreements established with a training
9 provider on behalf of a client.

10 **Scope:** This policy applies to all service providers operating Workforce Innovation and Opportunity Act (WIOA)
11 Title I Adult, Dislocated Worker, Out-of-School Youth (OSY) programs; program manager(s); fiscal officers, and
12 the monitoring team. This policy is effective January 1, 2020.

13 **Policy:**

14 **ITA Description:**

- 15 • WIOA Title I Adults and Dislocated workers purchase training services in consultation and discussion
16 with their case manager. ITAs encourage OSY participation in their education and training plans and
17 offer service providers flexibility in creating those plans.
- 18 • The client must have a completed Individual Employment Plan (IEP) or Individual Service Strategy (ISS)
19 indicating that, through interview, evaluation or assessment, the client is in need of training and has the
20 necessary ability to successfully complete the selected training program.
- 21 • Selection of a training program must include identification that the training is directly linked to
22 occupations that are in demand in the service area or in another area where a client is willing to
23 relocate. In determining local demand occupation(s), service providers may allow for training in
24 occupations that may have high potential for sustained demand or growth in the service area.
- 25 • Clients may select training programs in religious activities/occupations or self-employment provided the
26 training costs are covered through an ITA. The training must meet the requirements of the
27 Administrative Standards Policy and the Eligible Training Provider List Policy (ETPL).

28 **Limitations on who can Receive Training Services:**

29 Training services may be made available to employed and unemployed clients who:

- 30 • Are unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages
31 comparable to or higher than wages from previous employment through career services;
- 32 • Are in need of training services to obtain or retain employment leading to economic self-sufficiency or
33 wages comparable to, or higher than, wages from previous employment; and
- 34 • Have the ability to participate successfully in training services;
- 35 • Have selected a program of training services that is directly linked to the employment opportunities in
36 the local area or the planning region, or in another area to which the individuals are willing to commute
37 or relocate. In determining local demand occupation(s), service providers may allow for training in
38 occupations that may have high potential for sustained demand or growth in the service area;

- 39 • Are unable to obtain grant assistance from other sources to pay the costs of such training, including
40 such sources as state-funded training funds, Trade Adjustment Assistance, Federal Pell Grants, or
41 require WIOA assistance in addition to other sources of grant assistance; and
- 42 • Service providers must coordinate with partner agencies so that WIOA ITA funds supplement Pell and
43 other grant sources to pay for the cost of training.
- 44 • Clients may enroll in ITA-funded training while their application for a Pell Grant is pending provided that
45 the service provider has made arrangements with the training provider and the client regarding the
46 allocation of the Pell Grant, if it is subsequently awarded. If a Pell Grant is awarded, the training provider
47 must reimburse the service provider the portion of funds used to underwrite the cost of instruction up to
48 the amount awarded through Pell.
- 49 • Service providers will consider all available sources of funds, excluding loans, in determining an
50 individual's overall need for funds. Resources such as Pell, GI Bill, and other federal grants will not be
51 included in calculations of the level of assistance until the grant has been awarded.
- 52 • Reimbursement is not required from the portion of the Pell Grant assistance disbursed to the client for
53 education-related expense. Tuition is the sum charged for instruction only and does not include fees,
54 books, supplies, equipment, and other training related expenses.

55 Duration, Cost Limits and Availability:

- 56 • ITA limits are based on the client's identified needs such as occupational choice or goal and the level of
57 training needed to enter the workforce as quickly as possible. The dollar amount and duration of an ITA
58 must be reasonable and necessary for the specified training program and is subject to availability of
59 program funds.
- 60 • ITAs are awarded per quarter, semester, or uninterrupted training coursework. Second and subsequent
61 ITAs will be awarded only for continuing classes in the educational or training institution initially
62 attended, unless there is mutual and justifiable agreement between the service provider and the client
63 that another training institution or training program is necessary.
- 64 • After consultation with a case manager, an individual may select a training institution and program
65 listed on Montana's ETPL or another state's ETPL.

66 Payment System:

- 67 • ITAs are designed to identify costs associated with the training's cost of attendance. The cost of
68 attendance may include tuition, fees, room and board, books, supplies, and tools (if required). The ITA
69 identifies the client obligation. The client will be able to access information about the account from the
70 service provider. Each service provider is responsible for maintaining an ITA payment system which
71 ensures that payments made to Eligible Training Providers are timely, for the amount agreed upon, and
72 are supported by appropriate documentation.
- 73 • Financial responsibility for ITAs remains with the service provider who developed the ITA in consultation
74 with the client throughout the period of training, regardless of the location of the training provider.
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76 Retakes of Required Classes:

- 77 • Funds may be used to pay for retakes of required classes; with sufficient justification documented by
78 the case manager. Justifiable reasons to pay for a retake may include: requirement to attain a specific
79 grade to advance to higher-level coursework in the training program or circumstances beyond the
80 client's control such as an unforeseen health issue.

81 Documentation:

- 82 • Case managers are required to have monthly contact with their clients. Contact may be made by
83 telephone, through the e-mail, personal contact, or other appropriate means of communication.
- 84 • Documentation, such as attendance records, grade reports, or statements from the instructing agency,
85 are required as proof of participation and satisfactory academic progress.

- 86 • If the documentation indicates the client is not making satisfactory progress, the case manager will
87 maintain more frequent contact.
88 • Documentation of status of the training provider, either on Montana’s ETPL or another state’s list, must
89 be maintained in the client’s file.

90 **Monitoring and Evaluation:**

- 91 • A formal monitoring will be conducted by the entity designated by the State Workforce Innovation Board
92 (SWIB).

93 **References:**

- 94 • [20 CFR 680 Subpart C – Individual Training Accounts](#)
95 • [20 CFR 681.550 – ITAs for Youth Participants](#)