

JEFFERSON FRANKLIN CONSORTIUM INDIVIDUAL TRAINING ACCOUNT PROCESS

Section 134(c)(3)(B) of WIOA restrains an individual's qualification for WIOA Title I, Subtitle B, training funds if other sources of federal program assistance are available. Eligibility for WIOA training funds is restricted to those who:

1. Are unable to obtain other grant assistance, including federal Pell Grants established under Subpart 1 of Part A of Title IV of the Higher Education Act (HEA) of 1965,2 for training services; or
2. Require assistance beyond the assistance made available under other grant assistance programs, including federal Pell Grants.
 - a. In this instance, (2. Above) a financial needs determination will be completed by one stop center staff.

Individual Training Accounts (ITA)s may only be established for eligible and enrolled individuals. Costs may not be incurred prior to WIOA participation. If a customer applies for WIOA funds and they have already started classes WIOA cannot fund those classes. If a participant has already started training, an ITA can be issued to cover costs only after the next natural break in training (i.e. semester).

Participants will have access to the list of Eligible Training Providers on the statewide case-management system. ITAs are restricted to programs that address the skills needed for in-demand occupations.

Staff will avoid duplication of payment when costs are eligible for both WIOA training funds and other assistance. Coordination for establishing occupational/individual training accounts should include consideration of all available funding sources (excluding loans) to determine an individual's overall need for WIOA funds.

To determine funding eligibility, staff will follow all "priority of service" policies and consider the full cost of participating in training services, including the cost of support services and other appropriate costs. Staff will coordinate with the participant to calculate the total funding resources available as well as to assess the full "education and education-related costs" the participant will incur to complete the training program. This can include the costs of "dependent care and transportation, and other appropriate costs."

Individual participant need will be evaluated to include non WIOA funding grants with the intent of minimizing participant loan necessity, to the extent possible given funding constraints.

Staff will review the availability of other grants to pay for training costs, such as TANF, state training funds, Federal PELL Grants, and other grants to ensure WIOA funds supplement excess cost after consideration of non-WIOA grants. WIOA title I-B training funds should be the final, not the first, resort for funding training.

Documentation of training and other funds, when available, including PELL, other grants,

scholarships, and WIOA will be recorded and in the participant's file.

The determination should focus on the needs of the participant and not require the participant to apply for student loans or incur debt to participate in WIOA training activities.

WIOA Funds for training will be limited to the following dollar amounts unless excess approved by WDB Staff.

A short-term training (single term) maximum approval for a training program is \$10,000.

A multi-semester training program maximum overall approval is \$11,250/ year or maximum of \$3,750 per semester until maximum allowance has been depleted.

Non-WIOA funds shall be awarded to the extent of funding availability and with consideration for the constraints imposed on the non-WIOA funder's specific program requirements. Non-WIOA funds shall not be applied against WIOA fund limits above.

Pell and other grant awards shall be considered in the context of the full cost of participation in training activities. Post-secondary education providers must release a participant's financial aid information.

In the instance that funds are necessary for other training related expenses, and Pell or other grant funds are available to meet this funding need, a financial needs determination will be completed to calculate the amount of this need, and level of required WIOA funding support. Participants who are full-time students receiving federal Pell Grants may retain up to 50% and part-time students may be allowed to retain up to 25% of the federal Pell Grant to assist with other appropriate costs, while in training. Staff must maintain documentation to support the determination to retain a portion of the federal Pell Grant and must enter a case note explaining how the determination was made. The case manager must also document the mix of training and supportive services funds from WIOA and other funding sources, including Pell Grant funds, in a case note.

At all times funding decisions will be made based on individual eligibility for program participation and availability of local WDB tuition funds. Funding limits above are subject to mid-year change due to changes in demand for program participation and availability of funds.

This document shall align with Federal WIOA Law and governing federal regulations as well as the State of Missouri's most recent policy on "Coordination of Funding".

Procedures for Issuing Individual Training Accounts (ITA)

1. Training Provider must complete and sign an Administrative Procedures Agreement(attached) and include contact information for its entity.
2. Training Provider will be approved by the Jefferson/Franklin Region on the Eligible Training Providers System (ETPS).
3. An Individual Training Account/Occupational Skills training form with appropriate documentation will be submitted to the Fiscal department for approval.
 - a. Packet will consist of :
 - Individual Training Account/Occupational Skills training form
 - Cost Information
 - Comparative Assessment
 - Financial Needs Determination (if applicable)
 - ETPS/MoScores printout showing local approval
4. Once packet is approved, the form will be faxed /emailed to the Training Provider and obligation will be recorded in the Fiscal department.
5. Training provider will submit a Billing Form (attached) with supporting documentation after the school's drop date for payment.

**Jefferson/Franklin Consortium Office of
Job Training Programs (OJTP)
Administrative Procedures
Individual Training Account (ITA)**

- I. Workforce Innovation & Opportunity Act (WIOA) Approved Programs and Courses
 - A. The Workforce Innovation & Opportunity Act (WIOA), section 122, requires each state to publicize a list of educational institutions that qualify to receive WIOA Eligible Adult, Dislocated Worker and Youth federal funds for their training.
 - B. It is the responsibility of the training provider to acquire certification and maintain updated program/course information on the Missouri Eligible Training Provider System (ETPS) website (www.jobs.mo.gov).
- II. Tuition Charges, Reimbursements and Allowable Costs
 - A. Tuition Charges and Reimbursements. Standard tuition rates for a course(s) established by the institution will be the basis for calculating reimbursement payments for an individual training account. Charges for training cannot be more than that charged to the general public, or the amount listed on the Missouri Eligible Training Provider System (ETPS). The instructional periods of the training institution (quarters, terms or semesters) determine the tuition payment schedule.
 - B. Title IV student aid programs/funds and Workforce Innovation & Opportunity Act (WIOA) funds must be coordinated. The training institution agrees that its financial aid officer must provide the referring agency with information concerning the amounts and disposition of Higher Education Act (HEA) Title IV Awards and other types of financial aid to each WIOA participant served.
 - C. If the training institution receives both Title IV and WIOA funds for the same student, the training institution may not retain both to cover the same costs. If additional Title IV funds are awarded to the student, the referring office shall be notified to determine if the WIOA funds need to be decreased.
 - D. When a referring office submits an Individual Training Account (ITA) form, indicating that the costs to be paid for a student are something other than what the program/course actually costs, we will authorize the costs the referring office submits as long as it is the same or less than what the program/course costs. If the referring office submits an ITA form indicating that the costs to be paid are higher than what the program/course actually costs, we will not authorize the higher costs for tuition or fees.

However, for supplies we will authorize the higher costs since the training institution must document these costs when submitting the billing.

III. Billings

- A. For each instructional period, billings may be submitted once the school's drop period has passed. Bills should be submitted by the last day of the semester or period covered. For billing purposes, the training institution must use the billing form provided by OJTP (Individual Training Account Billing Form) and submit with documentation of expenses attached.
 - 1. For billing purposes, the student must be attending the program before submitting an invoice to OJTP.
 - 2. A training institution may not bill twice for the same course.
 - 3. OJTP is to be billed at the lowest rate available.
- B. Payments for training services are contingent upon the receipt of funds by OJTP from the awarding party or funding source.
- C. When submitting WIOA billings to OJTP the following must be adhered to:

The school may only bill for actual costs incurred. Documentation is required for all expenses. There must be documentation for all tuition, fees, and supply costs being billed. If the documentation does not support the costs being billed, payment will be withheld until appropriate documentation is submitted.

- 1. Payment for books, tools and other supply costs must be documented. Such documentation must be forwarded to OJTP accompanying the appropriate billing form. All supply costs must be reasonable and it must be an item that is required to complete the class. OJTP may, at its option, correct billings to comply with this policy.
- 2. Billings submitted **incorrectly** will either be corrected by OJTP staff or returned to the training institution for correction. Billings corrected and changed by OJTP staff may be done so without prior training institution approval.
- 3. Changes when they occur will be consistent with the most recent individual training account to facilitate prompt payment. Corrections to billings will be included with the monthly payment. Corrections, when required, may delay payment.
- 4. All billings/invoices and back-up documentation shall be emailed to:
WIOAinvoices@mersgoodwill.org

5. The training provider Financial/Billing Department contact person shall be provided to OJTP.
- D. Payment may be withheld, or training institution approval may be revoked or suspended by OJTP for inaccurate or fraudulent documentation.
- E. In the case of student termination, (defined as the last day of attendance) the refund policy of the institution shall be applied. Should a refund be required, this refund should be sent to the Office of Job Training Programs.
 1. The instructional period in which the student terminated will be the basis for determining the refund. The refund policy will be applied to the payment made for the last instructional period attended. Payments will not be made for subsequent instructional periods.
- F. Equipment, books, tools and supplies paid with WIOA funds are the property of the student to whom they were issued.

IV. Reports and Record Keeping

- A. The training institution must maintain participant records pertaining to the program for a period of four (4) years from the end of each fiscal year.
- B. WIOA participant records that should be maintained are:
 1. Individual Training Account (ITA) Form
 2. Individual Training Account Billing Form
 3. Attendance records which support the reimbursement method which is utilized.
 4. Source documentation for supplies and tools which are reimbursed.
 5. Performance data to include, at a minimum, employment/placement information and copy of credential(s) received for course completion.
- C. Documentation must be maintained on all students that support the data submitted to the State to meet the requirements of The Workforce Innovation & Opportunity Act Training Provider Certification.
- D. Documentation must be maintained of job placement outcomes and credential/performance information on each WIOA approved program. Report performance levels as requested by OJTP. A copy of students' credentials (degree or certificate) will be forwarded to OJTP upon request.

E. Training Provider will comply with all requirements, performance metrics & record retention/data sharing as outlined in the Workforce innovation & Opportunity Act, DOL Regulations, and Missouri Division of Workforce Development policy.

V. Nondiscrimination & Equal Opportunity Assurance

A. As a condition to the award of financial assistance under WIOA from the USDOL, with respect to operation of the WIOA funded program or activity and all agreements or arrangements to carry out the WIOA funded program or activity, that it will comply fully with the nondiscrimination and equal opportunity provisions of WIOA Section 188, 29 CFR Part 38.

B. The Office of Workforce Development and the Local Workforce Development Boards are responsible for ensuring WIOA recipients comply with the nondiscrimination and equal opportunity regulations, which includes being monitored for compliance with 29 CFR Part 38.

**Jefferson/Franklin Consortium
Office of Job Training Programs**

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Arnold, MO 63010

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Administrative Procedures Agreement

_____, agrees to the terms outlined in the Office of Job
Name of Training Provider
Training Programs Administrative Procedures.

Please provide ITA correspondence contact information:

Name of Contact

Email

Phone Number

Fax Number (where agreements are to be sent)

Please provide Billing/Payment correspondence contact (if not same as above):

Name

Email

Phone Number

Authorized Signature

Print Name

Title

Date