

ALABAMA WORKFORCE DEVELOPMENT SYSTEM

Department of Commerce
Workforce Development Division
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July 14, 2021

GOVERNOR'S WORKFORCE INNOVATION DIRECTIVE PY2021-04, Change 01

SUBJECT: Individual Training Account Guidelines

1. **Purpose:** This directive transmits the updated Individual Training Account Guidelines with the Registered Apprenticeship changes and information. These guidelines are effective July 1, 2021.
2. **Discussion:** These guidelines have been updated to include information regarding Registered Apprenticeships. Changes have been made through a joint effort of the Workforce Development Division staff and the Alabama Office of Apprenticeship (AOA) to coordinate our policies to ensure that we can provide the best and most efficient services to Registered Apprentices (RA) who access the Career Center and are WIOA eligible. Staff have made some revisions to the Individual Training Account Guidelines to better serve those apprentices who are attending training programs and are employed. The policies are intended to guide Career Center staff in all seven local areas in developing and managing Individual Training Accounts.

The RA information changes are listed below. Please read the attached guide closely.

- Page 5, Registered Apprenticeships are growing in number in Alabama. With these programs gaining acceptance, more individuals may be eligible for WIOA funded ITAs as a part of their registered apprenticeship program. ITAs can pay for a portion of the apprentice's training up to the limits set by each local area. The eligible apprenticeship programs will be listed on the ETPL and would follow the same process for application and eligibility determination in the Career Centers. Part-time training would be allowable only for apprentices who are WIOA eligible.
- Page 7, Registered apprentices qualifying for ITA funds will not be required to complete a TABE or other skills assessment unless it is specified in the work process of the registered apprenticeship for which they are seeking training assistance.
- Page 10, Registered apprentices seeking and qualifying for ITA funds will not be permitted to access funds without being required to meet other pre-requisite steps applied to other ITA recipients. The first two semesters requirement is waived for Registered apprentices as they are required to use all other available funding options prior to WIOA and Employer funded ITAs.
- Page 12, Most youth who are served through state funded dual enrollment may still be eligible for the entire length of training as specified in the course catalog or in the work process defined as part of a registered apprenticeship.

Individual Training Account Guidelines

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- Page 12, Registered apprentices may be alternating on the job learning (OJL) and related technical instruction (RTI) and will not be considered to have a “break in training” as long as they are actively registered and completing either OJL and/or RTI defined in the work process under which they are registered.
 - Page 14, The Alabama Office of Apprenticeship (AOA) has implemented a “last-dollar scholarship” policy for registered apprentices in which employers agree to be responsible for the unmet costs of training of registered apprentices in their programs after all other available supports have been accessed by the apprentice.
 - Page 15, Occupations and training tied to registered apprenticeships are automatically classified as in-demand because the registered apprenticeship program is hiring or taking open applications, there is a clear expectation of a job. Additionally, a person entering a registered apprenticeship is required to sign documentation of review of the apprenticeship standards including the job descriptions, wage progressions, and associated related technical instruction. As such, the apprentices may be considered to be fully informed about the career for which they are pursuing an ITA and career exploration activities will not be required of them. In order to exempt the objective assessment requirement, the apprentice must provide a fully executed copy of the Apprenticeship Agreement (Form 671).
3. **Action:** Staff responsible for the ITA program should be made aware of and comply with this policy for ITA participants enrolled in the local workforce development areas. All seven local areas are encouraged to adopt these guidelines. Please insert the updated pages in your current guidelines.
4. **Contact:** Questions regarding this Directive and the attached ITA Guidelines should be referred to Karen Williams, ITA Specialist, Workforce Development Division, Governor’s Local Workforce Development Areas at karen.williams@commerce.alabama.gov.

Tammy Wilkinson
Tammy Wilkinson (Jul 15, 2021 10:48 CDT)

Tammy Wilkinson, Division Director
Workforce Development Division

07/15/2021

Date

Attachment:

Individual Training Account Guidelines Revised

Individual Training Account

GUIDELINES

Revised July 2021

ALABAMA DEPARTMENT OF COMMERCE
WORKFORCE DEVELOPMENT DIVISION



alabamaworks.alabama.gov



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Foreword

These guidelines have been developed through a joint staff effort between staff of the Alabama Department of Commerce, Workforce Development Division (WDD), and Alabama Career Center staff within the State of Alabama. The policies contained herein are intended to guide Alabama Career Center staff in developing and properly managing the Individual Training Account process.

These guidelines are intended for use by the State of Alabama Career Center staff to provide the highest quality services to customers. This guide replaces all previous Individual Training Account Guidelines distributed by the Alabama Department of Commerce. In cases where participant services may be improved through exceptions to provisions of these guidelines and when those exceptions do not violate Federal, State, or Local Area policy, the Alabama Career Center staff are encouraged to make requests for exceptions on behalf of their customers.

I. Introduction

Individual Training Accounts (ITA) are established by the Alabama Workforce Development Board on behalf of Workforce Innovation and Opportunity Act (WIOA) participants to assist in attaining Training Services. Youth, Adult and Dislocated Worker funds available under WIOA are used to purchase Training Services from eligible training providers. Participants assisted by Alabama Career Center staff select a training provider. WIOA funds are received by the State and allocated to the Local Workforce Development Boards (LWDB) which set policies for the local workforce areas. The Workforce Development Division (WDD) staff serve as the administrative entity for five of the seven Local Workforce Development Areas. The five local areas, known as the Governor's Local Workforce Areas, include: North Alabama Works (Area 1), East Alabama Works (Area 2), West Alabama Works (Area 3), Central Alabama Works (Area 5), and Southeast Alabama Works (Area 6).

Priority of service is given to Veterans and others eligible for veteran's services. There is also a priority of service for low-income adults with little work history, public assistance recipients, and individuals who are basic skills deficient.

These guidelines are also used for Dislocated Workers who received services from the State's Rapid Response Team or the National Dislocated Worker Grant (DWG). An Individual Training Account for any funding source (Adults and Dislocated Workers or Youth) will be referred to as an "ITA."

WIOA defines Career Planning as a client centered approach in preparing and delivering the services required in their employment plan to ensure the participant has access to the necessary activities, computer-based technologies; and to provide job, education, and career counseling, as appropriate during program participation and after job placement.

WIOA is not an entitlement program. Determining eligibility, suitability, and enrolling applicants into the ITA program is the responsibility of Alabama Career Center staff.

A participant's need for training must be indicated through the assessment process and documented in case notes and the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and the Training Justification. This guide provides guidance to Alabama Career Center staff to clarify their responsibilities regarding the provision of services to all Career Center customers. Questions should always be directed to the immediate supervisor for resolution and then up the chain of command, if necessary.

II. Participant Decision Making Process

A key principle of the WIOA is empowering participants to take an active role in the development of Individual Training Accounts (ITA). Performance information, training costs, and cost comparison information for the training providers is available on the Alabama Eligible Training Provider List (ETPL). Participants can research careers, salaries and job openings through state and nationwide labor market sites, a labor exchange system available through *AlabamaWorks!*, and links to various websites frequented by job seekers. Advice, guidance and the support of Alabama Career Center staff and One-Stop Partners also empowers participants. The Career Center staff assists the participant in analyzing available labor market and training data to make a responsible decision regarding a suitable occupational training program that best meets their occupational goals and personal needs.

Registered apprenticeship programs are growing in number in Alabama. With these programs gaining acceptance, more individuals may be eligible for WIOA funded ITAs as a part of their registered apprenticeship program. ITAs can pay for a portion of the apprentice's training up to the limits set by each local area. The eligible apprenticeship programs will be listed on the ETPL and would follow the same process for application and eligibility determination in the Career Centers. Part-time training would be allowable only for apprentices who are WIOA eligible.

Participants can be served at any Career Center location without regard city or county residence. Career Centers can submit requests for training to any provider on the ETPL. Participants should not be sent from one Career Center to another for services from a training provider inside the second Career Center's service area. Likewise, participants should not be shuffled from one Career Center to another due to the unavailability of funds. In the event funds are unavailable, participants will be placed on a waiting list in the order of the date they completed the eligibility and pre-registration activities (with priority of service considered) for enrollment.

ITAs may be provided to Youth, Adults, and Dislocated Workers who have completed eligibility determination for WIOA services and demonstrate a lack of in-demand occupational skills. The need for upgraded skills (acquirable through training services) will be documented in the IEP/ISS and case notes. Adults and Dislocated Workers will receive sufficient services, including academic assessments, and preregistration activities to determine their training needs and suitability for training. Youth do not receive basic and individualized career services but, should all take the Full TABE. Eligible Youth will receive adequate Youth services to prepare them for training.

Career Center staff are responsible for determining if a participant needs training services based on a comprehensive assessment. Career Center staff should be able to clearly document that the participant possesses the skills and qualifications necessary to successfully complete training. The comprehensive assessment includes an in-depth interview, a diagnostic assessment of academic and occupational skill levels, aptitude and interests, and the development of an Individual Employment Plan (IEP)/Individual Service Strategy (ISS).

A. TABE

The Test of Adult Basic Education (TABE) 11/12 Locator Test will be used to test potential participants for Adult, Dislocated Worker and Youth ITA training slots. In instances where Adult Education partners provide TABE Testing, they will give the Locator Test *and* the Reading and

Math sections of the TABE. However, only the Locator Test will be used in the decision-making process for provision of an ITA. The individuals tested must score in the “M”, “D” or “A” Level of the TABE Locator Test to be considered for training. Individuals who score in the “E” or “L” Level will be referred to Adult Education classes to remediate. Once they raise their Locator Score to “M Level”, they may be served. The Locator can be administered as many times as necessary for a participant to achieve the “M Level”. However, the applicant must be remediating their deficiencies prior to retesting. **Youth participants are required to take full battery TABE and the assessment score must be uploaded in *AlabamaWorks!***

Potential ITA participants who score “M Level”, “D Level” or “A Level” may be considered for training regardless of curriculum. Training providers may have additional enrollment requirements or prerequisites that must be met before individuals are accepted into a program of study.

When the comprehensive assessment indicates Training Services are appropriate, the Case Manager initiates the ITA process. As participants progress through training, the IEP/ISS and case notes are required to be continuously updated and amended to record the participant's work toward the stated goals.

Registered apprentices qualifying for ITA funds will not be required to complete a TABE or other skills assessment unless it is specified in the work process of the registered apprenticeship for which they are seeking training assistance.

B. Pre-registration

Pre-registration activities/packets administered by the Career Centers are designed to assist the participant with the career exploration process and career pathway identification. Participants will be given a deadline for completing and returning their preregistration packets. This deadline must be adhered to if they expect to enter training on the date requested. These activities may include workshops, completing forms/questionnaires on labor market

information relative to the chosen training field, career and soft skills seminars, bringing in their college catalog, going over their course requirements with a case manager, taking prerequisite courses, completion of remedial courses on their own, and many others.

The participant's expressed interests and job goals annotated on the IEP/ISS are to be supported by an analysis of benefits cliffs and job forecasting through the Dashboard for Alabamians to Visualize Income Determinations (DAVID) and a review of the regional and statewide lists of in-demand occupations and dynamic career pathways approved by the ACCCP. The DAVID Dashboard link is located on the homepage in *AlabamaWorks!*. This resource can be accessed in the Job Seekers box under Find a Job. Staff can also access DAVID in the Online Resources Quick links in Alabama Works. In consultation with the Case Manager, participants research and discuss these jobs relative to availability, salary, education requirements, job demand characteristics, promotional opportunities, location, and fringe benefits.

C. Previous Training

While WIOA is not an entitlement program, there are no hard and fast rules regarding previous training/education programs completed by the participant. There is no such thing as "one and done" in determining whether to provide additional training. WIOA focuses strongly on career pathways. There may be several stackable credentials along the way to attaining a career goal. For example, if an individual has previously received an ITA to train as a CNA/PCT and they have worked in that field, but come in a year later needing assistance to complete a LPN degree and they are eligible for WIOA services, this individual may certainly receive training services as appropriate.

Likewise, having a degree, even a four-year degree, does not automatically exclude an individual from receiving an ITA. They may have received a degree in a non-demand occupation. A job search career service can determine if jobs are available in the individual's field of training. Also, in today's world of fast-moving technology, technical skills learned more

than two or three years ago may already be obsolete. A comprehensive assessment is the key to determining suitability for training services.

D. WIOA Funds and Pell Grant

WIOA funds are available for tuition and fees up to the maximum amount approved by the Local Workforce Development Board. WIOA funds do not pay for remedial courses, general studies, or pre-requisites to a course of study. Participants are required to apply for a Pell Grant each year of training.

ITA policy changes effective July 1, 2021 include:

- Two-year degree programs (5-6 semesters): **The cost of the first 2 semesters**, which include pre-requisites, **is the responsibility of the student**. ITA funds will pay for the remaining semesters, not to exceed the maximum local area allowable cost.
- ITA funds will cover tuition and fees, Pell Grant or other funding will pay for books and supplies.
- If the training is not Pell Grant eligible, the ITA will cover tuition, fees, books & supplies.
- After-graduation expenses such as certification testing, or licensing fees will no longer be reimbursed through the training provider or by the ITA Payment Office. The Human Capital Development fund will have money set a-side for the student for reimbursement of these types of expenses. The student will submit a reimbursement form and documentation to WDD, this will be a direct reimbursement to the student.
- **ITAs will be awarded for one program year at a time (July 1-June 30)**. At the end of the first year of training, participants must provide their grades from the previous semesters and reapply at the Career Center to continue ITA funding for the next program year.

The selected training must be designed to teach marketable skills and/or entry-level skills in a career ladder field that lead to a high-demand and high growth occupation. **Training must**

result in a job ready status at completion.

Registered apprentices seeking and qualifying for ITA funds will not be permitted to access funds without being required to meet other pre-requisite steps applied to other ITA recipients. The first two semesters requirement is waived for Registered apprentices as they are required to use all other available funding options prior to WIOA and Employer funded ITAs.

E. Online Courses

Training programs are frequently offered in online platforms only. To keep current with today's educational practices 100 percent online courses will be approved if the training provider has a physical building and facilities in the State of Alabama and the training program is linked to an in-demand occupation or dynamic career pathway approved by the Alabama Committee on Credentialing and Career Pathways (ACCCP). *The physical location of an employer hiring an apprentice inside the state will meet the physical location requirement.* The online training course must be a required course in the occupational training being pursued by the participant. The costs related to distance courses are paid according to the ITA policy changes effective July 1, 2021. **The costs of computer(s), Internet service, and related costs necessary for distance learning are the responsibility of the participant to pay with the Pell grant, or other sources.** Training providers may request 100 percent online training programs be added to the ETPL.

Each of the seven Local Workforce Development areas are encouraged to adopt this policy. It is the responsibility of the Career Center staff to ensure that the program meets all the requirements noted in this policy.

F. Curriculum Eligibility

Participants must be accepted into an occupational-specific curriculum that is on the ETPL. Associate degrees, transfer programs or programs that require an additional two years to be "job ready" are not eligible for ITAs. Associate degrees in applied science and other technical/occupational skills training that provides a technical degree, certificate, or license, including short-term training, that are linked to an in-demand occupation or dynamic career pathway approved by the ACCCP are eligible for ITAs. In addition, ITAs will only pay for a class one time. Courses that must be retaken because of failure or being dropped or courses not required by the curriculum, are not eligible for ITAs.

In *very limited situations*, ITA funds may be used to assist an eligible individual to complete up to the final two years of a four-year degree. This may be done in special circumstances on a case-by-case basis with approval granted by the local area management. This option is not designed to make WIOA training a "transfer" program for students with associate degrees. It is intended to help with a WIOA eligible individual that may have left a four-year training that is linked to an in-demand occupation or dynamic career pathway program approved by the ACCCP (the program must be on the Alabama Eligible Training Providers List) due to extraordinary circumstances, such as job loss, and now needs assistance to complete that degree. Participant's requesting this option must provide a transcript of courses taken with a GPA of at least a 3.0 in the major curriculum, and a letter from the training provider verifying that the four-year degree can be completed in 104 weeks or less. Participants must provide documentation of how they will cover costs more than the maximum allowable amount.

G. Youth

Out-of-School Youth (OSY) who have received training through a state-funded, dual enrollment program may be served in a full-time ITA once they have graduated from high school. The length of the training contract can be tailored based on credit courses taken while

still enrolled in high school. However, most Youth who are served through state funded dual enrollment may still be eligible for the entire length of training as specified in the course catalog *or in the work process defined as part of a registered apprenticeship.*

Youth interested in occupational skills training while still in high school can be served through an In-School Youth (ISY) ITA.

H. Break in Training

Courses must allow for full-time, year-round attendance. Inability to schedule classes during any semester/term is considered a "break in training" and individualized career services must continue to be provided during this time. The services provided must be value-added in nature and should contribute to the individual re-entering training in a timely manner. A break in training may be more than one semester in length, especially if a student fails a course that requires a retake to re-enter class rotation. *Registered apprentices may be alternating on the job learning (OJL) and related technical instruction (RTI) and will not be considered to have a "break in training" as long as they are actively registered and completing either OJL and/or RTI defined in the work process under which they are registered.*

I. Training Time and Funds

The maximum allowable training time for participants is 104 weeks. ITA contracts are approved for one Program Year (July 1 – June 30) at a time. Once the participant has completed the first year of training and submits a passing transcript, additional time and funds may be approved to complete training on curriculums that are longer than one year. However, if classes cannot be scheduled or if there is a break in training, a request to go beyond the 104 weeks may be considered with supporting documentation. If a course is unavailable, it must be verified by the training provider. Requests for additional time will be sent to the area management for approval.

J. Reenrollment

The participant must be financially able and willing to commit to the completion of occupational training that could last up to 104 weeks. In applicable cases, participants previously served under an ITA, who failed to complete training, may be considered for re-enrollment. Grades, attendance, case management notes and special circumstances, which prevented the participant from completing training, will be given consideration. The determining factor will be case notes written by the Case Manager who originally assisted the participant, requesting re-enrollment. It is extremely important that the final case notes written for a non-completer be specific and detailed regarding the reason training was not completed.

A written request to re-enroll a participant containing supporting documentation must be provided to area management. Case Managers should counsel participants that funds previously expended will be deducted from the maximum allowable amount for the current Cost Category. *The contract should be written only for the remaining time and funds.* Approval will be granted by Area Management and is determined on a case-by-case basis.

Based on cost limitations, Alabama Career Center staff may advise participants on the cost effectiveness of training options and make participants aware they are responsible for any costs over those funded by ITA. Participants must provide written documentation of their ability to cover these costs. This requirement is a part of the ITA Pre-Registration Activities. (Attachment B) Participants are given information on sources of financial aid, such as grants, student loans, scholarships, and work-study opportunities. **All ITA applicants must apply for a Pell Grant each year to be enrolled and to continue in the ITA program.**

K. Unmet Needs

Even with Pell Grant assistance, WIOA participants still have unmet needs. Most technical programs require tools and books that quickly use up available WIOA funds. These unmet needs should be documented on the Individual Employment Plan (IEP)/Individual Service Strategy (ISS) and as additional financial needs are determined, referrals to supportive

services should be provided to assist in overcoming barriers to the completion of training.

The Alabama Office of Apprenticeship (AOA) has implemented a “last-dollar scholarship” policy for registered apprentices in which employers agree to be responsible for the unmet costs of training of registered apprentices in their programs after all other available supports have been accessed by the apprentice.

L. Training-Related Employment

Because it is a reportable item, "Training-Related Employment" must be the expected outcome of any ITA provided. WIOA defines training-related employment as employment in which the individual uses a substantial portion of the skills taught in the training received. Careful consideration of jobs in demand in each Career Center service area should impact the training selected by potential participants. Potential participants should also be made aware of the many training-related occupations available relative to their major course of study. (i.e. a participant trained as an electrical technician who obtains a job as an industrial maintenance mechanic has received training-related employment.) Career Center staff should be aware of crosswalks (i.e. O*NET and the ACCCP's dynamic career pathways) that are available for training-related employment and should use them to document and report the training-related outcome in the exit questions of the electronic database. Alabama Career Center staff provide information on how to access ***AlabamaWorks!*** and other available sources to research high-growth, high-wage, high-demand occupations. In addition, Alabama Career Center staff provide career counseling to assist participants in meeting their occupational goals and overcoming barriers to their success.

For participants to make an informed decision about career options, Alabama Career Center staff assist them in exploring appropriate career areas and training options. During the decision-making process, participants will complete all the ITA Pre-Registration Activities available through the Alabama Career Center. The completed ITA Pre-Registration Activities Form should be returned to Alabama Career Center staff prior to the request for funding.

Occupations and training tied to registered apprenticeships are automatically classified as in-demand because the registered apprenticeship program is hiring or taking open applications, there is a clear expectation of a job. Additionally, a person entering a registered apprenticeship is required to sign documentation of review of the apprenticeship standards including the job descriptions, wage progressions, and associated related technical instruction. As such, the apprentices may be considered to be fully informed about the career for which they are pursuing an ITA and career exploration activities will not be required of them. In order to exempt the objective assessment requirement, the apprentice must provide a fully executed copy of the Apprenticeship Agreement (Form 671).

III. ITA Enrollment Procedures

Once the ITA requirements have been met, the Case Manager **enters the 300 activity into AlabamaWorks! Once entered, email the ITA request form to**

ITA@commerce.alabama.gov for approval. WDD has established the following

guidelines for emailing ITAs to ensure the ITA enrollment/approvals are processed in a timely manner:

- The ITA Request Form lists ***names of the ITA participants, the State ID Number from AlabamaWorks!, the total amount of money requested,*** the amount of Pell Grant awarded, and the number of weeks.
- The **subject line** of the email should include the **name of the Career Center** sending the ITA information.
- Once the email is opened by WDD staff, the Career Center will receive a "Received" response from one of the staff.
- A copy of the approved contract will ***be scanned into the AlabamaWorks! document folder for each participant by WDD staff*** and emailed to the case manager from the ITA payment

office once it has been processed.

The original ITA email list should be submitted no later than two weeks prior to first day of training and no earlier than 6 weeks prior to training. Exceptions may be considered on a case-by-case basis as approved by the Career Center Manager. Participants will not be enrolled with a training provider until the Career Center has received the **approval from the WDD**. Career Center staff will notify both the participant and training provider of contract approval. To assist in the ITA payment process, the Career Center must complete the enrollment process in the computer system **before submitting the ITA Request Form**. ITA records that have not been **entered will not be reviewed, nor approved**.

Prior to enrollment into an ITA, participants receive services from Alabama Career Center staff to ensure the required paperwork, applications, and placement examinations necessary for entrance into training have been completed.

This is the order of services that should be entered into Alabama Works before the 300 service:

- ***102: Initial Assessment: (provider is the Career Center and the service staff will select will be Career Center service). This service is for CIF staff have filled out when the participant first comes in.***
- ***203: Objective Assessment: (also provider and services will be Career Center). This service represents the information staff gather for the Eligibility.***
- ***204: Interest and Aptitude Testing: (Provider and service will be Career Center). This service represents the Objective Assessment Summary under the Plan (column 3).***
- ***205: Develop Service Strategies (IEP/ISS/EDP): (Provider and service are both Career Center). This service represents the IEP/ISS under the Plan (3rd column).***
- ***After staff enter the above services (in this order) and the Training Justification then the 300 Training Service can be entered.***

Once the student **begins class** you will have **2 weeks** to **enter the Actual Begin Date** or the *system will automatically close* the 300 service and WDD will have to be contacted to reopen.

State-funded ITAs will be processed through State Programs and Divisional Budget Management Section. Local-area-funded ITAs will be processed through Local Areas.

A. Funding Allocation

Local Areas allocate ITA funding for Adults, Dislocated Workers, and Youth. Each Alabama Career Center is responsible for managing their assigned funding allocations to ensure authorized funding levels are not exceeded.

The Alabama Career Center staff enters all information needed for the ITA contract including the exact cost of training per the ETPL, but not to exceed the approved maximum amount based on the cost category (Attachment G). ***If the participant is finishing the last semesters of training, only request the amount needed to complete, not the full cost.***

Reimbursement to the training provider will be based on the number of semesters/terms required to complete the program. The **ITA Amendment Form** is used to make changes to the original contract. Most changes (projected start date or end date within current program year July 1-June 30) can be changed by Case Manager with documentation in case notes. Only amendments that affect the **Budget**, Training **Provider** choice, and **Curriculum** change **are required** to be **approved**. **Career Center** staff will **email** amendment to ITA@commerce.alabama.gov. WDD staff will upload a copy of the amendment in participant's document folder in *AlabamaWorks!* and will forward copy to ITA payment office and case manager.

B. Vacating an ITA

Participants should be instructed to report to their respective training provider on the first day of scheduled training. If an extenuating circumstance occurs, participants must notify their case manager within 24 hours or they are considered "Failed to Report". Once the deadline has

passed and a participant has not reported to training, **Career Center staff** complete the Failure to Report, submit it to the ITA email and the training provider, **and enter the “Dropped Out” Completion Code in the closing tab of the 300 activity in AlabamaWorks!**. **Note: A failure to process the Failure to Report document may result in WIOA funds being paid for a person who did not show up for training. If the class is cancelled or the student decides to not attend before the first day of class then an Amendment should be sent to the ITA email and the ITA Completion Code entered by WDD will be “Void”.** The ITA Payment Unit will wait seven calendar days before processing payment to a training provider to give Career Center staff adequate time to verify a participant has reported to training or failed to report to training.

When it has been **verified** from the training provider that the participants have discontinued, or completed the training program, the Case Manager will **enter the participant’s outcomes into AW** and email termination form to WDD via ITA@commerce.alabama.gov and to the training provider. WDD staff will upload the form in *AlabamaWorks!* and send the Termination to the ITA Payment Unit. This form should be submitted within **two weeks** from the date the participant completes or discontinues training. If the required Termination is not received and entered by the end of the two-week period, the *AlabamaWorks!* system will automatically close the service and WDD will have to be contacted to have it reopened.

C. Co-Enrollment of TAA Participants

Co-Enrollment for TAA participants is required for all Trade Act Services provided at the Career Center whether TRA, ATAA or RTAA. When TAA participants come to the Career Center to utilize their trade act benefits, the Labor Exchange/TAA staff should always refer potential trainees to their WIOA counterparts for wrap around individualized career services. WIOA Case Managers will determine eligibility, complete assessments, and enter basic assessment information on the IEP for TAA participants. Participants will then be "handed back" to Labor Exchange staff who will complete case management services, monthly

benchmark contacts, per semester in-person benchmark meetings to gather grades and scheduling information, IEP updates, completion outcomes, employment information, and follow-up.

IV. Case Management/Communication with Alabama Career Center Staff

Case Management begins at participant registration into Individualized Career Services and continues through any services provided by the Alabama Career Center, WIOA funded partners and non-WIOA funded partners. Case Management Notes are part of the IEP/ISS and will:

- Thoroughly document all case management contacts
- Support decisions, activities, and needs recorded on the IEP/ISS
- Provide written evidence of a working relationship between participants and staff

Case Management Notes are electronic and are maintained in participants' *AlabamaWorks!* electronic case notes. Alabama Career Centers **will** keep these files for the period of nine years, which is specified by the WIOA and state record retention requirement.

A. ITA Orientation

All Alabama Career Centers provide a general orientation to WIOA services and training programs, including processes that must be completed to be eligible for an ITA contract. These orientations should be conducted regularly and early enough to allow participants time to complete all necessary requirements for ITA enrollment. These orientations should be advertised at the Career Center and through social media and may be conducted in several sessions depending upon the number of interested customers.

Prior to entering training, approved ITA participants must attend a mandatory ITA Orientation conducted by Career Center staff. This orientation may be in a group setting or on an individual basis.

Topics to be covered during ITA Orientation include:

- Failed to Report policy
- Full-time enrollment
- Year-round enrollment requirements
- Attendance requirements
- Financial-aid coordination including the yearly Pell Grant application
- Required books and tools policy
- Pre-approved curriculum changes (changing only after the end of first semester)
- Training provider handbooks, policies, and procedures
- Retaking dropped or failed classes
- Providing schedules, mid-term and final grades, and other documentation
- Equal Opportunity/nondiscrimination policy
- Right to file grievance and/or Discrimination complaint
- Follow-Up
- Potential eligibility for Trade Adjustment Assistance (TAA)

In addition, participants are informed of the requirement to maintain open and monthly communications with Alabama Career Center staff, particularly in the following instances:

- ❖ Entering employment or returning to a former job
- ❖ Changing funding sources, i.e., WIOA to TAA or TAA to WIOA
- ❖ Needing assistance for transportation, childcare, or other supportive service
- ❖ Moving, changing addresses, email addresses and cell phone numbers
- ❖ Adding, dropping, or withdrawing from classes
- ❖ Changing from day to evening or evening to day classes

- ❖ Scheduling classes not required by curriculum
- ❖ Having difficulty in scheduling a full course load
- ❖ Adhering to the training provider's attendance policy
- ❖ Experiencing other issues that could interfere with the successful completion of training

Upon completion of orientation, participants will sign the Training Rules and Responsibilities Form signifying that they understand and will abide by the rules of the ITA program. They should be advised that failure to comply with program rules or to report the above circumstances could affect their ability to retain ITA funding. They will be provided a copy of the Form with their signature. The participant will review, initial, and date the Rules and Responsibilities Form each semester during in-person contacts. Failure to report to the Career Center once a semester will result in a hold being placed on their funding by the training provider. **Case Managers should contact the provider and ask to place a financial hold on the participants WIOA funds until the participant reports to the Career Center.**

B. Progress Reports

Communication between ITA participants and Career Center staff is essential to the success of the individual and the maintenance of the training account. The Alabama Career Center Contact Information section of the Training Rules and Responsibilities Form provides the name, address, phone/fax numbers, and email address of the Case Manager who is working with the participant. **Participants are advised that monthly contacts are a mandatory requirement throughout training. An in-person review is required at the end of each semester.** The need for additional contacts is dictated by circumstances such as lack of academic progress, poor attendance, or need for further supportive service referrals. Participants are required to provide copies of schedules, grades, and/or progress reports to the Case Manager while receiving training services through an ITA. Participants should be reminded that this requirement is part of the Training Rules and Responsibilities. Individual Training Accounts are awarded for *one program year at a time*. The participant will *provide their grades/progress information at the end of each semester* during the program year.

Participants, who do not provide the required information should be contacted and reminded of their responsibilities by the Case Manager.

For an ITA to pay for training past the first program year, the participant must provide their grades in person at the Career Center and apply for continued ITA funding for the new program year. This will be processed as an Amendment to the original ITA.

C. Measurable/In-Progress Skills Gains

In-Progress skills gains are a reportable performance measure for WIOA. This measures the number of participants actively enrolled in an education or training program that leads to a recognized post-secondary credential, or employment, who are achieving measurable skills gains toward employment or a credential. These gains are measured in real time while the participant is actively enrolled in a career pathway. These skills gains must be documented in *AlabamaWorks!* and can include:

- Educational Functioning Level gains (EFL)
- High School Diploma
- GED attainment
- Developmental/remedial education completion
- College level course completion in the CHOSEN career pathway
- College level Math or English course completion
- Credit accumulation of 12 semester hours or 15 quarter hours within the career pathway
- Credit accumulation of 24 semester hours or 30 quarter hours within the career pathway

D. Break in Training for Case Managers

It is not unusual for some training programs to offer a limited selection of classes for the summer semester and participants may be unable to schedule a needed class. Breaks in

training services should be used for participants who are unable to schedule a class for any semester. These participants should still receive Individualized Career Services from their Case Manager each month until they are able to schedule the needed class.

If the participant has a break in their training services, it must be documented in the Case Management Notes. Provide the reason for the break, the participant's intent to return to complete the program services, and the anticipated date of return and any further communication from the participant regarding their break in services. Failure to contact their Case Manager could result in a participant's ITA being terminated.

The Case Manager works to establish a trusting relationship with participants and takes every opportunity to encourage participants to contact them whenever a need or problem arises. Participants are advised that 'issues' are best handled at their onset, rather than waiting until they have become problems.

E. Case Notes

Case Management contacts are to be made every month. These notes are required to be recorded case notes in real time as the contact is made. Copies of supporting documentation be scanned into *AlabamaWorks!*. That documentation, along with case notes, provides evidence of an on-going, working relationship between participants and the Alabama Career Center staff. Referrals, interventions, counseling, and other case management assistance provided to participants should be documented and uploaded into *AlabamaWorks!*.

Case notes should be titled according to the nature of the contact or stage of the WIOA process the client is in. Generic Subject Lines should be avoided when entering notes (ex: "Monthly Contact" or "Client Contact").

Examples of Suitable Subject Lines for Case Notes

WIOA Eligibility

Credentials/MSGs Received and Entered

WIOA Enrollment

Termination Sent

Client Start Training

[Month] Monthly Contact

Client Completed Training

[Month] Follow

All WIOA services, including Individualized Career Services, are closed at the completion of participant services. All completion information should be reported in *AlabamaWorks!* in real time. Tracking, reporting of employment, and provision of job retention services are follow-up services and should be documented in *AlabamaWorks!*

V. ADDITIONAL WIOA OUTCOMES AND PERFORMANCE FOR ITA

A. Credentials, Certificates and Degrees

“Credential” is an umbrella term, which encompasses postsecondary degrees, diplomas, licenses, GEDs, certificates and industry-recognized certifications. Credential Rate is one of the performance measures in WIOA.

The Governor established the Alabama Committee on Credentialing and Career Pathways (ACCCP) and its technical advisory committees which are composed of business and industry members representing each sector. The ACCCP is responsible for determining the valuable career pathways in each region and for evaluating credentials. Once the credentials are included on the Alabama Credential Registry, the ACCCP reviews the credential against the ACCCP’s credential quality assurance criteria. Once the ACCCP approves the credentials, they are included on the Alabama Compendium of Valuable Credentials and would be

potentially acceptable for the WIOA credential measure.

The Workforce Innovation and Opportunity Act (WIOA) emphasizes credentials for **Adults** and **Dislocated Workers**. For Adults and Dislocated Workers, earning a credential has been defined as “***obtaining a recognized postsecondary credential or diploma during program participation or within one year after program exit***”.

The **Youth** credential performance measure has been changed for WIOA; Youth have a year after exit in which a credential can be recorded. In addition, a Diploma/GED will be counted ***only if the participant is either employed or enrolled in a training program*** leading to a postsecondary credential **within one (1) year after exit**.

A credential is to be awarded in recognition of an individual’s attainment of measurable technical or occupational skills. These technical or occupational skills are generally based on standards developed or endorsed by employers in order to allow the participant to:

- Enter Employment
- Re-enter Employment
- Retain Employment
- Advance within an Occupation

Credentials include:

- Postsecondary Degrees
- Diplomas
- GEDs
- Licenses
- Industry-Recognized Certifications

1. What are Credentials?

Credentials are an important element of the workforce development system. Ideally, obtaining a credential indicates an individual has mastered competencies and knowledge relevant in the labor market. Credentials are normally issued to the individual by a third party (e.g. educational institution, an industry/occupational certifying organization, or professional society), which has authority to issue such a credential. Credentials must be Industry-recognized, stackable and portable post-secondary credentials at a minimum. Alabama has developed a system through the ACCCP to evaluate and categorize credentials as follows:

1. The credential is either **required by law**, including any credential mandated by the laws or regulations of the State of Alabama or the United States of America; **mandated by industry**, which shall include any credential mandated by two (2) or more firms within an industry sector; or **preferred by industry**, which shall include any credential endorsed, but not required, by two or more firms within an industry sector.
2. The credential is **required to obtain a job** (counts toward attainment goal and is an advanced credential on the compendium of valuable credentials); **part of a stackable sequence** leading to a credential that is required for employment (included on the compendium of valuable credentials as a basic credential, but these credentials do not count towards the attainment goal); **complementary credentials** with skills that are affiliated with the career pathway but are not directly aligned to the credential sequence (can be included on the compendium of valuable credentials as a complementary credential but are not included in credential sequences and do not count towards the attainment goal) complementary credentials are non-qualifying credentials;
3. **Accredited or recognized** by a statewide or national industry-recognized accrediting body, such as a sector or industry association.
4. **Aligned to an occupation** on a regional or statewide list of in-demand occupations.
5. **Achievable by students** in a secondary and/or the postsecondary level of study.
6. **Earned after a minimum number of hours of instruction time**, as determined by the Alabama Committee on Credentialing and Career Pathways, and awarded after achieving a passing score, as determined by the sponsoring industry sector, on a

proctored examination.

7. **Stackable in a sequence** of aligned competencies that progress along with the rigor of advanced training programs.
8. **Valuable** as determined by leading to at least a twenty (20)-percent wage premium over a high school diploma.
9. **Traceable and trackable** by the ATLAS on Career Pathways as determined by the Office of Education and Workforce Statistics.
10. **Portable across or within an industry sector** to establish the qualifications of individuals in multiple geographic areas, among multiple education and training institutions, and by diverse employers.

2. Types of Credentials

Credentials come in many different forms and are issued by a wide variety of entities.

Credentials are either degree or non-degree credentials.

Degree credentials are issued by accredited educational institution, which is most often the designer of the credential and the developer of the associated curriculum. These are typically portable throughout the country. Examples include:

- Educational Diplomas/Certificates (Secondary School Diploma/equivalent)
- Educational Degrees (Associate/Bachelor's degree)

Non-Degree Credentials include:

- Occupational License, Industry Certifications, Certificates, and Registered Apprenticeship Credentials. Includes:
 - Registered Apprenticeship Credentials—Issued by the Alabama Office of Apprenticeship
 - Non-Degree Certificates
 - Occupational license—Typically, but not always, awarded by government entities before an individual can be employed in a trade, profession, or occupation. Licenses are intended to set professional standards and ensure safety and quality of work.

Industry-Recognized or Professional Association Certification—Issued by 3rd party, non-governmental organizations based on standards set to demonstrate professional qualifications and/or competencies.

3. Recognized Postsecondary Credential

A recognized postsecondary credential is awarded based on a participant's attainment of measurable technical or industry/occupation skills necessary to obtain employment or advance within an industry/occupation. These technical skills or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

Note: Complementary credentials do not meet the definition of a recognized postsecondary credential and are non-qualifying credentials.

- Stand-alone Work Readiness certificates do not meet this definition
- General Skills related to Safety, Hygiene, etc. do not meet the definition due to the fact these certificates are broadly required to qualify for entry-level employment.

A recognized postsecondary credential must recognize industry/occupational skills for a specific industry or occupation and must be registered and listed on the Alabama Credential Registry beginning July 1, 2021.

4. Credential Issuing Entities

There is a wide array of public and private credential issuing entities and organizations. They can be grouped into three general categories:

1. Government
2. Educational Institutions
3. Businesses, Non-Educational non-profits, and Industry Associations

Examples of Non-Qualifying Credentials

Non-qualifying credentials will not be counted toward performance. However, such credentials can be of value to participants as a building block for educational and/or occupational success.

Single Skill Certificates - General and Single Skill certificates in and of themselves do not provide the depth of knowledge necessary to provide a significant advantage to the job seeker, thus would not meet the spirit of the credential measure.

Certificates of Attendance - Certificates of Attendance/Completion and/or Participation do not reflect demonstration or attainment of industry knowledge, skills, or attributes; thus, do not meet the spirit of the credential measure.

Work Readiness - It is the expectation that participation in workforce development should enhance the Work Readiness of all clients. These types of certificates do not tie to technical or occupational skills within an occupation. Work Readiness certificates do not meet the spirit of the credential measure.

High School Certificate of Completion/Attendance - A high school certificate of attendance indicates the student has completed high school but did not demonstrate mastery of required skills. It is not the same as a High School Diploma. High School Attendance certificate does not meet the spirit of the credential measure.

This list addresses the most common non-qualifying credentials but is not all inclusive.

Credential Type	Example
General/Single Skill	CPR First Aid OSHA Job Safety training ServSafe food safety Standard driver's license Work Key Certificate
Certificate of Attendance/ Completion/Participation	Conference Attendance Certificate
Work Readiness	JAG competency certificate Work Readiness Credential
Workforce Development Board	Certificates awarded
High School Certificate of Attendance	

5. Credential Performance Measure

In order to get 'credit' for a Credential; the following outcomes are the only positive outcomes that will be recognized:

- High School Diploma/or Equivalency
- AA or AS Diploma/Degree
- BA or BS Diploma/Degree
- Post Graduate Degree
- Occupational Skills Licensure
- Occupational Skills Certificate
- Other Recognized Diploma, Degree or Certificate
- Non-Degree certificates & others as described previously

The Credential performance measure is calculated in the following manner:

of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent** during participation in or within 1 year after exit from the program

divided by

of program exiters who were in postsecondary education /training program; plus the # of program exiters in a secondary education program (at or above the 9th grade level) without a high school diploma or equivalent

**** Secondary School Diploma/Equivalent Diploma will only count as a “positive” outcome if the participant is either employed or enrolled in a training program leading to a recognized postsecondary credential within 1 year after exit from the program.**

This measure allows a one-year delay following Exit for the outcome to be Attained and recorded into *AlabamaWorks!*; thus the importance of FOLLOW-UP.

NOTE: When recording the date, the Degree/Certificate or Credential was attained, use the date indicated on the degree, certificate, or credential.

The Workforce Development Division (WDD) will determine whether a Provider issued certificate is an allowable credential for performance purposes.

Credentials must have “**measurable**” technical or occupational skills associated with them; must have labor market value. A qualifying credential provides documentation of education and/or technical or occupational skills necessary to gain employment or advance within an occupation.

Credentials must provide a valuable return on investment for our workforce system customers. Qualifying credentials must be registered and listed on the Alabama Credential Registry at www.credentials.ache.edu beginning July 1, 2021.

B. Employment

Employment-related performance measures for ITA for Adults and Dislocated Workers include:

- Entered Employment Q2: Measured in the 2nd quarter after the Exit Quarter
- Entered Employment Q4: Measured in the 4th quarter after the Exit Quarter
- Average Median Earnings: Measures the Median earnings in the 2nd Quarter after the Exit Quarter

If immediate job placement is not accomplished after training, Career Center staff should continue Case Management monthly contacts to facilitate job placement efforts. Career Center staff work closely with participants at appropriate intervals both before and after obtaining employment. These Career Services are known as Follow-Up Services.

Some participants find suitable employment through their own efforts. However, training providers, instructors, and Alabama Career Center staff must assume a leadership role in providing job search activities. As ITA participants near the end of their training, Case Managers should direct the participant to return to the Career Center and assist them in creating a top-notch resume. This resume will be posted in *AlabamaWorks!* and copies given to participants as they prepare for their job search activity. Additional job search sources and assistance is available through the Alabama Career Center System and include the *AlabamaWorks!* website alabamaworks.alabama.gov, Career Center Labor Exchange staff, labor market information, other internet job search sites, newspaper ads, and contacts with local business and industry. All participants who complete their training and have trouble locating a job should be scheduled to meet with the Career Center Business Service Representative for referral to a short-term On-the-Job Training Contract.

C. Follow-Up Services for Adults and Dislocated Workers

Follow-Up may be conducted in any of the following ways:

- Face-to-Face conversations
- Phone call/Text/E-mail/Letter
- Case Manager's 1st hand knowledge (documented)
- UI wage verification
- Supplemental Data

Follow-Up attempts can be documented using:

- Case Notes
- Emails or Texts from participants
- Facebook/Social Media
- Letter
- Employment Verification Form (Attachment H)
- Telephone Verification Form

It is very important to stay in contact with the participant throughout the WIOA enrollment period, from start to exit. Participants are required to complete 12-months of Follow-up Services, which begin 90 days after their last service. Participant employment can be verified by wage records including New Hire Data, Federal employment records, Military employment records, Other Administrative wage records or Supplemental Data from the Case Manager's knowledge.

Follow-Up services have as much value as the other components of the WIOA program. Participants should be aware "upfront" that Follow-Up services will be made available to them after leaving the program. The goal of Follow-Up services is to prevent job loss, ensure job retention, wage gains and career progress for those who obtain unsubsidized employment. The Case Manager may assist in arranging an array of services designed to improve the employment status of the participant during Follow-Up. All Follow-Up services will be documented in Case Notes.

While Follow-Up services must be made available, not all Adults or Dislocated Workers who are placed in unsubsidized employment will need or want such services. Adult and Dislocated Workers may decline Follow-Up services. Case Notes must clearly document that Follow-Up services were offered to the participant and were declined.

Follow-Up services are determined on a case-by-case basis and may include:

- Additional Career Planning
- Counseling to assist in Job Retention, Increase Earnings and completing education requirements
- Contact with the participant's employer, including assistance with work-related problems that may arise
- Peer Support Groups
- Information pertaining to Additional Educational Opportunities
- Referral to Supportive Services available in the Community
- Non-WIOA services

Follow-Up services must be made available to participants the first day after program completion and continues for 12 months. The intensity and frequency of Follow-Up contacts is based on the needs of the individual.

Follow-Up contacts must be meaningful and may not simply be a contact to obtain needed data.

There is no minimum number of attempts that must be made to meet the requirement to offer Follow-Up services. The Case Manager, after no less than six attempts, may cease contact if one of the following is documented:

- No longer employed with the initial employer and current employment status unknown
- Has moved with no forwarding address
- Phone has been disconnected
- No other alternative contact information is available
- Participant refuses Follow-Up services

The Case Manager will document the appropriate scenario and no other contact attempts are needed. However, the appropriate scenario must be documented for all subsequent follow up periods.

Follow-Up begins after the participant Soft Exits from WIOA and any partner services. The 'clock begins ticking' at Soft Exit as to their inclusion in performance measures. Several Adult and Dislocated Worker measures are captured after program exit, thus information gathered during Follow-up can be used as Supplemental Data to capture performance for the following:

- **Entered Employment Q2**: Is based on verifiable wages captured in the 2nd quarter after the exit quarter.
- **Entered Employment Q4**: Is based on verifiable wages captured in the 4th quarter after the exit quarter.
- **Credential Rate**: Number of participants who obtained a recognized post-secondary credential or diploma during the program or within 1 year after program exit.

The Entered Employment performance measures are gathered via UI wage data (state and nationally). For those participants not found in UI wage data (self-employed, cash-only, tips, etc.), Supplemental Data can be used. Supplemental Data can be attained and verified by first-hand knowledge of employment situation, usually documented as follows:

- Supplemental wage forms
- Case notes (visual observation)
- Employment verification (pay stubs, W-2, etc.)

Documentation needed for the Credential Rate is verified during the 1-year Follow-Up period and includes copies of:

- Transcript
- Certificate
- Diploma

D. Follow-Up Services for Youth

Follow-Up services are another important part of Youth ITA Services providing support and guidance after placement. Follow-Up assists with employment and educational achievement, advancement on the job and/or educational ladder, and personal development.

The types of follow-up services provided are based on the needs of the participant. **Follow-up services should include more than just a contact attempt for securing documentation for performance outcome.** Regular contacts with the Youth to ensure successful continuation of employment or education may be sufficient as a Follow-Up service, if the case manager has determined the Youth is not in need of additional services.

Follow-Up contacts will begin at the completion of ITA program participation. WIOA states that Follow-Up services will be provided for "not less than 12 months" and these services begin at the completion of participation in Youth Services activities. Intensity of the Follow-Up activities may vary with each Youth based upon their individual needs.

Follow-Up services may include:

- Leadership development activities
- Regular contact with the participant's employer, including assistance with work- related problems which arise

- Assistance in securing better paying jobs, promotions, and career development
- Work-related peer support group
- Adult mentoring
- Case management and progress tracking during training/educational programs
- Supportive services referrals
- Tracking progress and helping once training/educational programs are completed

E. Supplemental Data

The primary data source for capturing the performance measures of Entered Employment Quarter 2 and Quarter 4, and Median Earnings is accessing UI wage records (state and nationwide). UI wage records include private sector, non-profit sector, and government employer wage data.

Certain types of employment situations are not covered by UI wage records such as:

- Self-employed
- Federal employment
- Postal Service
- Military
- Railroad
- Some Agricultural employment
- Employment based on Commission
- Tips or Cash-only payments

Supplemental data will be used for program management as well as to gain a full understanding of program performance. For those individuals who are not found in either the state UI wage records or the nationwide WRIS database, Alabama has the

option to gather and report supplemental data for the above-mentioned performance measures.

It is anticipated that case management especially during the Follow-Up period will be the most common method used to obtain timely Supplemental Data. It is likely during this period that certain employment situations will be verified and documented in the electronic data base (i.e. self-employed, working for cash, etc.).

For those participants not covered by state UI records, supplemental sources of data can be utilized to document entry and retention in employment. These sources must be properly documented. Allowable forms of documentation include:

- Telephone/form/mail response from participant documented with W-2 form, pay stub, 1099 form or other written documentation when available
- Telephone/form/mail verification with employer documented by W-2 form, pay stub, or other written documentation when available
- Telephone/form/mail verification for Self-employed
- Case Notes
- Other Automated data base systems (could be through partner service)
- Administrative Records (i.e. government employment records)
- Revenue or Tax records (i.e. accessing Dept. of Revenue for self-reported occupations)
- Participant's license and/or business-related documentation

All data and methods to secure and verify supplement employment data must be documented and are subject to audit.

Local Areas will identify program exiters who have not been found in UI or WRIS wage records and provide Career Centers a printout within 30 days for those participants who are not showing UI wages in Quarter 2 and Quarter 4 after exit.

VI. ITA PAYMENT GUIDELINES

A. ITA enrollment

The ITA enrollment originates in the Career Center, is approved through the Department of Commerce Workforce Development Division (WDD) and is required to be on site at the training provider's location **before the student begins training**. The **contract** contains information that will be used to create the student's account and to submit billing claims for reimbursement of allowable costs. The training provider's financial aid office and business office should coordinate with each other regarding the student's enrollment.

The enrollment is completed in *AlabamaWorks!* by the Career Center, approved by the WDD, and is distributed to the ITA Payment Office and training provider. Also, listed on the enrollment form is the ETPL is breakdown of cost categories for tuition, fees, required books, and required supplies. The ITA Payment Office requests a detailed breakout of training costs to be submitted for each program detailing estimated costs for tuition, fees (school & curriculum), supplies, books, etc. This detail list should help to reduce confusion of supply, tool, & uniform purchases by the student. Student expenses are not applied per category amount listed, but to the total amount allocated as approved in the ITA Agreement.

B. WIOA Payment enrollment and Pell Grant payments

If a student is enrolled in a training program scheduled for two years/six semesters, the student is required to cover the costs of the first two semesters prior to WIOA funds being applied. The student may enroll into a short-term training program as part of or leading to the long-term training program and once successfully completing the short-term program, can request to continue

in the long-term training program (Ex. LPN to RN, EMS short and long program, etc).

If a student is receiving for the Pell Grant funds, the student is required to apply their Pell Grant funds toward the costs of their books, supplies & tools. If the students Pell Grant award only partially covers those costs, WIOA funds can be applied toward the balance of charges.

If a student is NOT eligible for Pell Grant, WIOA will cover the eligible costs of tuition, fees, books, supplies & tools.

Tools to assist the student in their classroom training can be purchased throughout the training program. Training providers should not allow students to purchase tools at the end of the training program to spend the available balance left in the student's allocation. It would be advisable to call the ITA Payment Office when a tool purchase is over \$2,000 to verify fund availability. WIOA funds should not be used to purchase high-end priced tools, the goal should be to find a middle ground of cost and quality.

Pell funds that are applied to books/supplies/tools should be those WIOA eligible before WIOA funds can be used to cover expenditures over Pell fund amount. If the student uses Pell Grant to purchase a non-approved laptop for example, and does not have enough money to then cover the books/tools/supplies, then WIOA will not cover the remaining amount for books/tools/supplies.

C. WIOA Funds – items covered, and items not covered

Reimbursement for training costs will not exceed limits established by state and local policies. The ITA Agreement lists the approved allocation budget amount. Training costs (that are greater than the amount on the ITA Agreement) will be the student's responsibility.

✦ **ITA funding covers:**

- Tuition – required courses for the approved curriculum
- Fees – required for each student, medical tests/shots, liability insurance, graduation
- Books – required by instructor (electronic or paper, but not both) *and only if Pell Grant funds are not available*
- Supplies – required by instructor *and only if Pell Grant funds are not available*
- Tools – required by instructor *and only if Pell Grant funds are not available*
- Short term programs **only** - *can include testing and licensing in their total one-time payment*

✦ **ITA funding does not cover:**

- Pre-requisite, remedial, or repeat for drop/failure (WIOA paid 1st time) classes
- Out of state tuition rates
- Shipping costs of student orders
- Tax costs on purchases
- “High end” supplies (gold nursing pins, gold nursing watches, expensive brands of tools when average cost tools are available)
- Electronic Equipment items such as computers, printers, ipads, ipods, e-readers, etc. (even if required by instructor-still not allowed) (exception for Calculator for Accounting Majors)
- Testing, certifications and licensing fees that occur *after* graduation ex. NCLEX and licensing (**these fees are not being processed by the ITA Payment Office** for reimbursement)
- Extra uniforms or tools – exceptions given in emergency situations, fire, theft etc. No additional funds are provided in these cases just permission to use WIOA funds to purchase replacement items vital to the completion of training.
- College clothing, backpacks, carriers, meal plans, or housing allowance
- Suggested study guide materials
- General Health Insurance
- Additional graduation options outside the general graduation fee, ex. group picture, graduation uniform, lamp, etc

Staff may call the ITA Payment Office at (334)353-5165 if they are unsure about a particular reimbursement item or cost.

C. Reimbursement Information

1. General Information and Form ITA 31 – Reimbursement Request Requirements:

To receive reimbursement, a Reimbursement Request must be submitted by the training provider to the ITA Payment Office. The Form ITA 31 may be used or training providers may use a computer-generated printout from their accounting system, if more convenient, efficient, and provides the necessary information for reimbursement (see below-required items). Training providers are asked to submit/mail 2 sets of reimbursement requests with at least one of the copies having an original signature of the training provider's representative.

The ITA Payment Office will only disburse WIOA funds to the training provider. No ITA payments are paid directly to the student or vendor. WIOA students can be reimbursed for out-of-pocket expenses that can't be provided by the training provider. The student must coordinate with the training provider prior to the purchase regarding the training provider's policy and procedures (prior approval, purchase orders, approved vendors, deadline dates for submission of receipts for reimbursement, etc.) for reimbursement of WIOA funds to avoid any misunderstandings.

ITA Payments may be made by electronic funds transfer or paper check by mail. The training provider chooses which option when registering your entity into the State's Accounting System, the STAARS system.

2. Reimbursement Submission Deadlines

Reimbursement requests should be submitted within 20 class days from the start of training date or after the drop/add date. Short term training (13 weeks or less) billing claims may be submitted during the first week of training, with attendance verified by the Career Center. For training of less than 12 months with a payment structure that is all inclusive, training providers may receive one payment or establish prorated amounts per the training period. Supplemental billing may be submitted at any point during training showing the period of billing as the date of occurrence instead of the start and end dates of the semester. **Beginning PY 2021, testing, certifications, or licensing fees will no longer be reimbursed through the ITA Payment Office.** Short term programs that include the cost of licensing and testing within the total cost of the one-time payment will be covered by WIOA funds. Specialized training programs where certification and testing are extremely high can be considered for WIOA assistance with special request and the cost must be included on the ETPL.

Advance payments are not allowed for the WIOA program.

The Program Year for the ITA program is July 1st through June 30th. WIOA expenses, which occur within those program year dates, must be paid within that program year. Deadlines are given each year for reimbursement of expenses occurring during the program year. Failure to submit billing claims in a timely manner within the listed period of billing the designated program year could result in delays or non-payment. Students who complete/terminate, should have all their account expenditures submitted for reimbursement within one month of their termination date.

3. Required items and how to complete the reimbursement request form

1. Period of Billing – the timeframe of the billed expenditures
Exp.- start and end date of a semester or start and end date of a session, if supplemental billing, the date of occurrence.
2. Training provider's name(s) and address as it is listed in the STAARS system
3. Area/Fund – ITA Payment Office will complete
4. Student name and SSN (at least last 4 digits) or Student ID# (must follow the PII Policy)
5. Cost Breakout – Tuition, fees, books, supplies and total for period of billing
6. Voucher number- ITA Payment Office will complete
7. Original Signature of a representative from the training provider certifying that the charges are correct and within the guidelines of WIOA payment requirements

If there are have multiple names, please list the names in alphabetical order.

4. Documentation / Purchased Items Information

All receipts for purchases must be signed by the students and maintained by the Training providers in their records as backup documentation for auditing and monitoring by State and Federal agencies. Receipts do not have to be submitted with the billing claim for reimbursement unless the training provider is an out-of-state entity. Source documentation is required, except for State entities.

WIOA book and supply purchases may be tax exempt. Training providers should coordinate tax exempt status with their in-house bookstore or supply vendors. WIOA will not pay taxes on purchases. The participant is responsible for the tax charges for non-tax-exempt purchases.

It is recommended that training providers do not allow WIOA students to charge books/supplies to the training provider accounts prior to the start date of training.

Receipts submitted for services and items prior to start date are not allowed. Items purchased in prior semesters or months before the approved start date aren't eligible for reimbursement with WIOA funds. If the student fails to start or return to training, depending on the termination date, reimbursement for purchases may not be possible with WIOA funds.

It would be beneficial and can expedite the billing and payment process to have an official list of required books, supplies, tools, uniforms, and other items could be provided to the Financial Aid and Business offices to compare receipts of items purchased with what is required. Training Providers should provide the ITA Payment Office a detailed list of program cost similar to the ETPL breakout but with more detail on tuition, fees, tools, supplies, and costs of each.

5. Credit/Refund Information

There are two (2) options for a training provider to return WIOA funds. The training provider may submit a credit invoice similar to the reimbursement request, which must be submitted within the Program Year dates (7/1-6/30) of original submission or a refund check, including information on the student account that is receiving the credit. The refund check should be made payable to the State of Alabama/Department of Commerce/WDD/ ITA Payment Office and mailed to the ITA Payment Office.

D. Termination – early withdrawal and scheduled end date

When a student leaves training early or on the scheduled end date, the case manager must provide a Termination form to the WDD who will provide the termination to the ITA Payment office. Billing Claims may be submitted after a Report of Termination

has been submitted for those expenses that occurred prior to the termination date. **Tuition, books, or supplies cannot be reimbursed if purchased after the termination date.**

The Report of Termination may be rescinded by the career center. Submit a copy of the original Report of Termination with "RESCINDED" at the top of the form with the date. Email to ITA@commerce.alabama.gov.

E. Changes in Student Curriculum/Program Enrollment

Any changes in training (curriculum, funding allocation) for the ITA student that differ from the original approved ITA agreement requires an ITA Amendment Form to be submitted for approval. **The ITA Amendment must be approved before a student can change their curriculum.** If the student enrolls or is assigned classes not in the approved curriculum, WIOA will not pay the costs related to those classes. Students are required to maintain communication with the Career Center and failure to do so may involve placing a hold on future charges and termination from training for that participant.

F. Eligible Training Provider List

The Eligible Training Provider List (ETPL) provides information, which is referenced on each ITA enrollment (length of training, cost, curriculum). Information on the ETPL is provided by the training provider. It is important that the information is current and up to date on costs for training programs. There will be a set timeframe during the year for providers to add or update program information. Out of state training providers must apply to be placed on the Alabama ETPL since there are no longer border agreements for ETPL list.

All new providers added to the ETPL will be limited to 10 participants for the first

year. The participants must be enrolled no later than October 31 and performance will be evaluated for the remainder of the program year ending June 30. If the provider is determined eligible for another year, they may enroll more participants the following program year. *This does not apply to occupational skills programs that have been funded for one year and are now eligible for the ETPL.*

G. WIOA Training Provider Agreement Packet

The WIOA Training Provider Agreement Packet must be completed, submitted, and approved prior to receiving payment. The completion of the Training Provider ITA Agreement and other documents along with the enrollment into STAARS and the E-Verify program are required. This packet will be required to be updated every five years and the Workforce Development Division will contact the training providers when information is needed.

H. Contact information

For information about ITA reimbursements, student account activity/balances, ITA charges, or WIOA Training Provider Agreement Packet.

Tamara C Holcomb

Tamara.holcomb@commerce.alabama.gov

334-353-5165

ITA Payment Office Mailing Address	ITA Payment Office Physical Address
Alabama Department of Commerce Workforce Development Division ITA Payment Office Post Office Box 304103 Montgomery, AL 36130-4103	Alabama Department of Commerce Workforce Development Division ITA Payment Office 401 Adams Avenue Suite 380 Montgomery, AL 36104

VII. REFERENCES:

- WIOA Section 134 (c) (3)
- WIOA Section 129 (c) (2) (D)
- Title 20 CFR 680.230
- Title 20 CFR 680.300, 680.320, 680.320, 680.330, 680.340
- Title 20 CFR 681.550
- GWID No. PY2015-14, Change 1