**WIOA Young Adult Program**

**Chapter 12: Individual Training Accounts (ITAs)**

Summary
Individual Training Accounts (ITAs) can be an important tool in assisting both in-school youth, ages 16-21, and out-of-school youth, ages 16-24, in completing education and training coursework as part of a career pathway.

Relevant Laws, Rules, or Policies
[Workforce Innovation and Opportunity Act (Public Law 113-128)](http://www.gpo.gov/fdsys/pkg/PLAW-113publ128/html/PLAW-113publ128.htm)

[WIOA Final Rule (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf)

[WIOA Final Rule: Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-14 (Dated 3-26-15)](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4244)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 8-15 (Dated 11-17-15)](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6073)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 21-16 (Dated 3-2-17)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7159)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 7-18 (Dated 12-19-18)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4255)
[U.S. Dept. of Labor Training and Employment Guidance Letter No. 14-18 (Dated 3-25-19)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7611)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 11-19 (Dated 2-6-20)](https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-11-19)
[U.S. Dept. of Labor Training and Employment Notice No. 22-19 (Dated 4-3-20)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=8754)
[Office of Management and Budget Code of Federal Regulations 2 CFR 200](https://gov.ecfr.io/cgi-bin/text-idx?SID=970b58af63fde7ba10fd201add7ec48c&mc=true&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (Uniform Guidance)
[U.S. Dept. of Labor Training and Employment Notice No. 12-21 (Dated 10-15-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=9977)
[U.S. Dept. of Labor Training and Employment Notice No. 14-21 (Dated 10-27-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6118)
[U.S. Dept. of Labor Training and Employment Notice No. 18-21 (Dated 1-4-22)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3439)
[2018 WIOA Core Monitoring Guide](https://doleta.gov/grants/pdf/2018_Core_Monitoring_Guide.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 10-16, Change 2 (Dated 9-15-22)](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2022/TEGL%2010-16%20Change%202/TEGL%2010-16%20Change%202.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 1 (Dated 10-25-22](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2019/TEGL%2023-19%20Change%201/TEGL%2023-19%2C%20Change%201%20%28Complete%20document%29.pdf))

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 9-22 (Dated March 2, 2023)](https://www.dol.gov/agencies/eta/advisories/tegl-09-22)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 2 (Dated 5-12-23)](https://www.dol.gov/agencies/eta/advisories/tegl-23-19-change-2)

[U.S. Dept. of Labor Training and Employment Guidance Letter 10-23 (Dated 2-21-24)](https://www.dol.gov/agencies/eta/advisories/tegl-10-23)

Approved ISY ITA Waiver Request, dated June 7, 2022 (attached)

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Policy

In order to enhance individual participant choice in their education and training plans and provide flexibility to service providers, DOL allows, with Minnesota’s approved waiver, Workforce Development Areas (WDAs) to use ITAs for both in-school youth, ages 16-21, and out-of-school youth, ages 16-24, using WIOA youth funds when appropriate. WDAs wanting to take advantage of this waiver to serve in-school youth must include the relevant components in their workplan that is on file with DEED, along with a revised budget, where appropriate.

**IMPORTANT POINTS:**

* ITAs CANNOT be provided to participants who do not have federally issued work authorization.
* Young adults between the ages of 22 and 24 who are in post-secondary school at the time of enrollment are NOT eligible to be served under WIOA Young Adult program, since they are considered “in-school youth” and the law specifically caps ISY age eligibility at 21. They may, however, be eligible for the WIOA adult program.
* Unlike WIOA Adult or WIOA Dislocated Worker programs, ITAs are **NOT** required for WIOA Youth Participants. WDAs/youth service providers are encouraged to use training providers from Minnesota’s Eligible Training Provider List (ETPL) when providing training outside of an ITA but are NOT required to do so.

The use of an ITA for any eligible WIOA youth participant should be in accordance with the participant’s Individual Service Strategy (ISS). It may be used in instances where a primary focus of the ISS is determined to be the development of skills necessary to help connect the youth with a career pathway. The ITA is not intended to be an alternative to acquiring a high school diploma or GED.

The Local Workforce Development Board (LWDB) should establish policy regarding the structure and criteria governing the use of ITAs, if the WDA chooses to use ITAs with WIOA Youth participants. The local policy might include (but not be limited to):

* Requirements tying training to in-demand occupations;
* Providing training for occupations with established career pathways;
* Local caps on ITA expenditures and duration of training. Limits to ITAs may be established in different ways:

(1) There may be a limit for an individual participant based on needs and/or goals identified in the ISS, such as the participant’s occupational interests and the level of training needed to succeed in that goal; or

(2) The LWDB may establish a maximum amount of funding applicable to all ITAs, and/or limitations on what may be covered via program dollars through the ITA.

* Any other local policy-based ITA criteria approved by the Local Board.

The exact nature of the ITA and for whom it will be used is decided at the local level. The following issues are examples of the types of decisions that should be made by the WDA and included in the policy:

* Who will be an appropriate candidate for an ITA?
* Who will be required to sign off on an ITA?
* What will be the payment mechanism (e.g. vouchers, electronic fund transfer, consumer “smart cards”, or other methods)?
* What processes or procedures will be used to track ITA payments?
* Will the ITA be for a specific amount, time period or both?
* Will the ITA include anything other than tuition, books, fees and supplies (such as supportive services)?

Certain basic principles must be followed by ALL WDAs in establishing systems for the use of ITAs:

* ITAs can only be used for WIOA eligible participants. A participant must have work authorization to qualify for an ITA, or any occupational post-secondary training.
* ITAs can only be used with WIOA-certified training programs. Training providers must be on the Eligible Training Provider List (ETPL). **Reminder: ITAs are NOT required under WIOA Youth to provide training services. Use of the ETPL when providing training outside an ITA is optional but encouraged.**
* A school must be willing to accept ITAs in order to be a WIOA-certified training program provider.
* An individual must be able to access data on how many dollars are in his/her ITA. (The mechanism for doing this is a local decision.)
* An ITA may include money for supportive services, but this is a local decision.
* An ITA must be part of an ISS that is agreed to by both the participant and counselor/case manager.
* An ITA must be used in conjunction with other applicable funding sources.

Expenditures and enrollment should also be tracked locally for older youth ITAs.  The ITA allows the WDA to more carefully monitor what is being spent on training and training related costs.

Information maintained in the case file and/or data recorded in Workforce One relating to ITAs may be subject to data validation requirements that are currently under development.

The Department of Labor 2018 Core Monitoring Guide reviews the provision of training services to program participants, including the use of ITAs. Local areas can expect the local ITA policy and practices to be part of regular program monitoring by state and/or federal monitors.

**ITAs in conjunction with Registered Apprenticeships or OJT’s**

The final rule highlights registered apprenticeship programs as a training service for both ITAs and as OJT. Registered apprenticeship programs are automatically eligible for the ETPL. Apprenticeship programs that are not registered are allowed to go through the eligible training provider (ETP) process if they want to be on the ETP list.

ITAs can be used to support placing participants in registered apprenticeship through:

(1) Pre-apprenticeship training

(2) Training services provided under a registered apprenticeship program up to limit of ITA.

DEED monitors will review use of ITAs, including documentation in the ISS and tracking of funds used for ITAs during routine desk reviews and on-site monitoring.

For more information on the WIOA Certification Process and Minnesota’s Eligible Training Provider List (ETPL) visit: <https://mn.gov/deed/programs-services/dislocated-worker/wioa-adult/resources/>

[DEED Youth Website](http://mn.gov/deed/programs-services/office-youth-development/index.jsp)



