

# Oklahoma Employment Security Commission



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## OKLAHOMA EMPLOYMENT AND TRAINING ISSUANCE #19-2005 CHANGE 1

**DATE:** May 25, 2006

**TO:** WIA Board Staff  
WIA Fiscal Agents

**FROM:** Director, Workforce Integrated Programs Division

**SUBJECT:** Individual Training Account Policy

**PURPOSE:** To update policy regarding the establishment of Individual Training Accounts (ITAs), coordination with other funding sources, and payment of training expenses. This policy clarifies documentation requirements to establish ITAs, verify coordination with other funding sources, and requires grant recipients to substantiate ITA expenditures. Finally, this policy incorporates waiver provisions which enable Workforce Investment Act (WIA) program operators to use the Eligible Training Provider System for Older and Out-of-School Youth.

**BACKGROUND:** The Workforce Investment Act of 1998 establishes the basic principle that the cost of an eligible participant's selected training program is fully paid and that necessary supportive services are available so that the training can be successfully completed. As stated in the preamble of the WIA Final Rules the intent is to ensure that WIA funds are not duplicating other grant assistance payments or exceeding allowable cost of attendance. Recent Federal and State monitoring efforts have identified confusion over requirements to consider and coordinate all sources of funding assistance available to a participant; questions regarding sequencing and assigning available funding resources to training costs, and related roles and responsibilities of various involved entities; and concerns over when WIA training funds must be reimbursed from Pell grant awards. Previous State policy has inadvertently added to this confusion. This revision is intended to eliminate perceived ambiguities and provide clear policy direction.

**MESSAGE:** ITAs are established with WIA funds, for participants who are unable to obtain grant assistance from other sources or requires assistance beyond that available under grant assistance from other sources for training services. The requirement to coordinate ITAs with other grant sources is intended to ensure the use of WIA funds is always secondary to the use of funds from other sources. ITAs must be established to account for WIA funds expended for training or training-related activities and must be used for training which leads qualifying individuals to self-sufficiency. ITAs are required when training is funded for

adults and dislocated workers, and may be established for Older and Out-of-School Youth. Pursuant to Oklahoma's waiver, Older and Out-of-School Youth may select eligible training providers from the Eligible Training Provider List.

## **Individual Training Accounts**

### **Establishment**

WIA Section 134(d)(4)(F) establishes the requirement that "training services ... shall be provided in a manner that maximizes consumer choice in the selection of an eligible provider of such services." Section 134(d)(4)(G)(i) provides that "training services shall be provided through the use of individual training accounts ... and shall be provided to eligible individuals through the one-stop delivery system." Exceptions allowed under Section 134(d)(4)(G)(ii) enable use of a contract for services in lieu of an ITA if requirements of subparagraph (F) are met and if services are on-the-job training provided by an employer or customized training; the local board determines there are an insufficient number of eligible providers of training services in the local area involved to accomplish the purpose of a system of individual training accounts; or the local board determines that there is a training services program of determined effectiveness offered in the local area by a community-based organization or another private organization to serve special participant populations that face multiple barriers to employment.

WIA Section 134(d)(4)(A)(iii) explains that funds allocated for adults or dislocated workers shall be used for adults or dislocated workers who select programs of training services that are directly linked to the employment opportunities in the local area involved, or in another area in which adults or dislocated workers receiving such services are willing to relocate, when they are unable to obtain other grant assistance made available under other grant assistance programs, including Pell Grants. Participants must select programs of training services which are directly linked to employment opportunities in the local area involved or in another area to which the adults, dislocated workers, or older and out-of-school youth receiving such services are willing to relocate. The Governor has further directed that WIA training opportunities should focus on community talent growth and aligning the workforce with targeted industry clusters (existing or emerging).

ITAs are financed with adult and dislocated worker funds authorized under WIA Title I. On July 7, 2005 the State of Oklahoma was granted a waiver of the prohibition on the use of ITAs for Older and Out-of-School Youth at 20 CFR Section 664.510, through June 30, 2007. Accordingly, Older and Out-of-School Youth may select eligible training providers from the Eligible Training Provider system and ITAs for these participants may be financed with funds allotted to the State for youth activities pursuant to WIA Section 127. ITAs make it possible to pay for training services for skills in demand occupations as defined by local Workforce Investment Boards (WIBs) from eligible training providers on the State's approved listing of eligible training providers. [Sections 134(d)(4)(F)(ii) and 134(d)(4)(G)(iii)]. Payments may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods.

Payments may also be made incrementally, through payment of a portion of the costs at different points in the training course. [WIA Section 134(d)(4)(G) and 20 CFR Part 663.410]

The State has provided an ITA Agreement Form (Attachment A) for establishing ITAs. Local areas may modify this form to meet local requirements, however, the form used must include at a minimum all of the information contained in the sample. Also, a Voucher/Voucher Modification Form (Attachment B) is provided to facilitate the administration of funds. This form may also be modified to meet local requirements, however, the form used must include at a minimum the following: funding stream, amount paid by category, total number of hours, participant's signature and date, WIA Program Operator's signature and date. Additional acceptable voucher forms may include: purchase orders, payment requisitions, encumbrances, etc, as long as the form contains the voucher requirements as stated above.

Dollar amount and/or duration limits established by WIB policies if any, must be described in local workforce development plans, but should not be implemented in a way which undermines the Act's requirement that training services are provided in a manner which maximizes customer choice in the selection of an eligible training provider.

#### **Limited Exceptions to the use of ITAs**

ITAs are the primary method under WIA for providing occupational skills training leading to a degree, certification, or employer recognized skill certificate. Contracts for services may be used instead of ITAs only when one of the following exceptions applies:

- When the services provided are on-the-job (OJT) or customized training;
- When the local WIB determines there are an insufficient number of eligible providers in the local area. The local plan must describe the process to be used in selecting the providers under a contract for services. This process must include a public comments period for interested providers of at least thirty (30) days.
- When the local WIB determines there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve special participant populations as defined in WIA Section 134(d)(4)(G)(iv), which face multiple barriers to employment. The WIB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the special participant population to be served. This criteria may include, but is not limited to:
  - Financial stability of the organization;
  - Demonstrated performance in measures appropriate to the program including program completion rate; attainment of the skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment and retention in employment; and
  - The relevance of the specific program to workforce investment needs identified in the local plan.

The term “special participant population that faces multiple barriers to employment” means a population of low-income individuals that is included in one or more of the following categories:

- Individuals with substantial language or cultural barriers;
- Offenders;
- Homeless; and
- Other hard-to-serve populations to include “individuals with disabilities.”

### **Consumer Choice**

Training services, whether accessed by establishment of ITAs and the providing of vouchers or contracted arrangements, must be provided in a manner which maximizes informed consumer choice in selecting an eligible training services provider in accordance with the goals and objectives outlined in the client’s Individual Employment Plan (IEP) or Individual Service Strategy (ISS). WIBs, through the local one-stop center, must make available to customers the State list of eligible providers required in WIA Section 122(e).

An individual who has been determined eligible for training services may select a training provider from the State eligible training provider list after consultation with the WIA program operator. Local WIBs set the policies for accessing ITAs.

### **Local Board Policy**

Local board policy must establish the following requirements for establishing ITAs:

- Procedures for documenting in the IEP/ISS the sequencing of services for unemployed and employed individuals to receive training services.
  - For unemployed individuals:
    - Has met eligibility requirements for intensive services (received at least one core service and determined to be in need of more intensive services to obtain employment), **and**
    - Has received at least one intensive service, **and**
    - Has been determined to be unable to obtain or retain employment through such services.
  - For employed individuals:
    - Has met eligibility requirements for intensive services (received at least one core service and determined to be in need of such services to obtain or retain employment that leads to self-sufficiency), **and**
    - Has received at least one intensive service, **and**
    - Has been determined to be unable to obtain or retain employment through such services.

- Procedures for documenting in the IEP/ISS that through interview, evaluation, or assessment, and case management the WIA program operator or One-Stop partner has determined that the individual is in need of training services and has the skills and qualifications to successfully complete the selected training program.
- How the training will be directly linked to the local board's approved demand occupations or those in another area to which the individual receiving such services are willing to relocate.
- How participants will learn of demand occupations or skills and how exceptions to the list of locally recognized demand occupations will be handled. The WIB must be involved in the exception process. The demand occupations or skills are to be contained in the local workforce development plan.
- How the ITA training services policy will be communicated in simple, understandable language to customers of the one-stop center.
- How the participant will have access to the list of eligible training providers through the one-stop system. Note: The Oklahoma Employment Security Commission's (OESC's) Workforce Integrated Programs has published the list of eligible training providers on the Oklahoma Job Link website ([www.oklahomajoblink.com](http://www.oklahomajoblink.com)) for customer convenience. Participants must be able to access WIA training services from any eligible training provider on the state list.
- The ITA must be established only for the training and training related costs specifically required by the eligible training provider for the approved program and paid to the eligible training provider. Training related costs not available through the eligible training provider must be provided as a supportive service in accordance with local supportive service policy and procurement policy, and must not to exceed the unmet need that was determined by the financial aid officer.
- If a dollar amount and/or duration limits for an individual participant is/are established, how such limit(s) will be based on the participant's needs as identified in the IEP or ISS.
- Procedures so participants will be assisted early in the assessment process, as appropriate, to establish eligibility for Higher Education Act Title IV funds and other forms of financial aid. This includes providing participants with appropriate application forms and any needed assistance in completing and submitting them. These application forms are accessible online at [www.FAFSA.ed.gov](http://www.FAFSA.ed.gov).

### **Documentation**

The following documents are minimum requirements for establishing an ITA:

- IEP or ISS with information documenting eligibility for training services.
- ITA form (sample provided at Attachment A)

## Coordination of ITAs with other Grant Assistance

### General

Funding for training is limited by WIA Section 134(d)(4)(B) to individuals who are:

- Unable to obtain grant assistance from other sources to pay the costs of their training; or
- Require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

WIA program operators and eligible training providers must consider the availability of Pell Grants and all other available sources of financial assistance, including other Federal programs but excluding loans, in determining an individual's overall need for WIA funds to pay for allowable training costs. This is intended to ensure that WIA funds supplement other sources of training grants. To avoid duplicate payment of costs when an individual is eligible for both WIA and other assistance, WIA program operators and eligible training providers must coordinate by entering into arrangements with the entities administering alternate sources of funds, including eligible training providers administering Pell Grants [20 CFR Part 663.320 (a) and (b)]. All WIA areas will use the Coordination of Training Funds form (Attachment C) to provide the documentation of coordination between the WIA program operator, entities administering alternate sources of funds, and the eligible training provider. The Coordination of Training Funds form must be completed by a financial aid officer (or those personnel who perform those duties), before WIA training is approved. All financial resources, excluding loans, including WIA funds (training and supportive service funds) cannot exceed the total cost of attendance as indicated on this form. A new Coordination of Training Funds form is required each time a new voucher is issued or annually whichever is most appropriate for the type of training institution.

WIA program operators, entities administering alternate sources of funds, and eligible training providers are responsible for ensuring and so documenting that tuition-specific awards from all other sources have been applied to the tuition/fees costs first. This comprehensive coordination of available funds by WIA program operators and eligible training providers will make sure there is no duplication of payments.

The exact mix of funds should be determined based on availability of funding for either training costs or supportive services, with the goal of ensuring costs of the training program the participant selects are fully paid and that necessary supportive services are available so that the training can be completed successfully. This determination should focus on the needs of the participant. There are three caveats:

- WIA funds for training services are limited to instances when there is no or inadequate grant assistance from other sources;
- Participation in a training program funded under WIA may not be conditioned on applying for or using a loan to help finance training costs.

- Duplicate payments of costs when an individual is eligible for both WIA and other assistance (including Pell grants) must be avoided.

Section 134(d)(4)(B)(ii) permits a WIA participant to enroll in an eligible training program with WIA funds while an application for Pell Grant funds is pending. However, pursuant to 20 CFR Part 652 § 663.320(c), the WIA program operator must make prior arrangements with the eligible training provider and the WIA participant regarding allocation of the Pell Grant, if it is subsequently awarded. If the Pell Grant is awarded, the local WIA program operator must be reimbursed for WIA funds previously used to underwrite training for the amount the Pell Grant covers. This is to ensure non-duplication of payments. Pursuant to clarification found in the preamble to 20 CFR Part 652, since Pell Grants are intended to provide for both tuition and other education-related costs, only the portion specifically provided for tuition is subject to reimbursement. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIA participant for education-related expenses. Therefore, the exact mix of all available funding (including Pell Grants and WIA program resources) should be constructed with the goal of ensuring that the costs of the approved training program the participant selects are fully paid without duplication and that necessary supportive services are available so the training may be completed successfully. WIA program operators are responsible for ensuring duplicate payments for training program costs are not made with WIA funds.

### **Local Board Policy**

Local board policy must ensure the use of WIA funds is always secondary to the use of funds from other applicable sources by establishing the following coordinating requirements to:

- How the value of each ITA will be determined (e.g., will there be a cap on value, will the cap vary for occupations or populations, etc.?). A range of amounts and/or a maximum amount applicable to all ITAs may be established;
- A process for documenting how sources of funding other than WIA grant funds were sought first (e.g., Pell Grants, Oklahoma Higher Access Learning Program (OHLAP), National Emergency Grants, Trade Adjustment Assistance, one-stop programs other than WIA, etc.). How the WIA program operator will ensure that all financial aid resources, excluding loans, including WIA training and support funds will not exceed the total cost of attending training for the academic year as determined by the financial aid officer (or those personnel who perform those duties).
- Guidelines to determine and document, prior to training enrollment, that to the extent practicable, available Federal, State, local, and personal resources are coordinated sufficiently to meet the training and education-related costs of services without duplication of payments, so the participant can afford to complete the agreed-upon program successfully while not receiving funds in excess of identified allowable costs. Resources may include wages earned by the participant through employment while attending training.

- A methodology to determine the participant's training-related financial assistance needs, and how local staff will record those needs and the mix of funding assistance (employment and training and Higher Education Act funding) in the participant's record.
- Procedures and forms to authorize release of participants' financial aid information by post-secondary institutions.
- The ITA payment mechanism shall contain language which establishes safeguards to ensure that WIA (and other one-stop partners') funds are used in addition to funds otherwise available, and are coordinated with those funds.
- Language that participant is not required to apply for or access student loans or incur personal debt as a condition of participation. However, the participant may incur personal debt when agreed to and after counseling regarding the responsibilities associated with the indebtedness, including loan repayment. Such counseling must be acknowledged in the participant's record.

### **Documentation**

A properly completed Coordination of Training Funds Form (Attachment C) must be used to verify that funds from all sources were appropriately coordinated.

## **Payment**

### **General**

ITAs are established on behalf of participants who then purchase training services from eligible providers they select in consultation with a case manager. Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments may also be made incrementally, through payment of a portion of the costs at different points in the training course.

### **Local Board Policy**

Local board policy must be established to provide for the following:

- The internal procedure for endorsing and facilitating access to training services. Please see Attachments A and B for sample forms which may be used to facilitate this service.
- A process for documenting the expenditures that is in accordance with the voucher and ITA.
- A process for tracking WIA Title I expenditures paying for the individual's training;
- The method for disbursement of funds. Only eligible training providers on the State's list of eligible providers are able to redeem ITAs for payment.

## **Documentation**

Minimum requirements necessary to validate the appropriate expenditure of WIA training funds include:

- A copy of the e.g., voucher, purchase order, invoice, source documentation, receipts, etc. that will support the payment mechanism.
- A tracking document (e.g., spreadsheet, report, etc.) to ensure locally established funding limits have not been exceeded.

NOTE: When the agreements negotiated are performance-based contracts, one-stop centers must prohibit training institutions or organizations from holding the student liable for outstanding charges. Otherwise, the performance agreements would be undercut because the incentive for the institution or organization to perform would be removed. Also, the U.S. Department of Education prohibits the practice of withholding Pell Grants from students.

**ACTION REQUIRED:** Local board policy, reflecting the guidance provided herein, must be developed and implemented (i.e., put into use) no later than August 1, 2006. All current participants' ITAs must be brought into compliance and that the coordination of funds must be completed for any Fall 2006 enrollment. Local policies and local operating procedures concerning the cost of training and training-related expenses must reflect prudent fiscal management to best enable students to achieve approved program success. While every effort should be made to honor commitments made to WIA program participants, those participants must understand program limitations and their own level of responsibility for program success.

**CONTACT:** Refer all inquiries to Tami Decker at [TDecker@oesc.state.ok.us](mailto:TDecker@oesc.state.ok.us) or (405) 962-7595.

Attachment A – Individual Training Account (*Sample - Local areas may modify this form to meet local requirements, however, the form used must include at a minimum the information contained in the sample.*)

Attachment B – Individual Training Voucher Form / Modification Form (*Sample - Local areas may modify this to meet local requirements, however, the form used must include at a minimum the following: funding stream, amount paid by category, total number of hours, participant's signature and date, WIA Program Operator's signature and date.*)

Attachment C – Coordination of Training Funds Form (*This form is to be standard and used by all WIA areas.*)

# SAMPLE

Attachment A

## Individual Training Account (ITA)

Participant: \_\_\_\_\_

ITA Start Date: \_\_\_\_\_ ITA End Date: \_\_\_\_\_

Amount of Individual Training Account (ITA): \$ \_\_\_\_\_

### ACKNOWLEDGEMENT AND AGREEMENT

- The amount of my ITA has been awarded based on individual factors including cost of attendance, coordination of other funding sources, and needs identified in my IEP.
- ITA funding may be used to assist with tuition and fees as well as books, uniforms, tools, equipment, or supplies required for training/degree plan.
- This ITA is limited to the amount and the scheduled start and end date stated above.
- It is my responsibility to budget and track my ITA expenditures to insure that the funds available to me are not depleted prior to completion of training. I will coordinate with my case manager and verify my ITA balance as necessary.
- I understand that I must meet or exceed attendance and academic requirements of the school/training provider.
- I understand that I am not required to access student loans or incur personal debt as a condition of participation. However, if I chose to do so, I understand the responsibilities associated with such indebtedness, including loan repayment. My case manager has counseled me in regard to this issue.
- Continued participation is subject to continued availability of funding by the Department of Labor.
- I agree to monthly contact with my case manager to discuss my training progress and any other issues, whether academic, personal, or financial, that may affect the successful completion of my training.
- I will immediately inform my case manager of changes of name, address, phone number, or back-up contact information.
- Prior to the beginning of each new semester I will schedule an appointment with my case manager to complete a voucher for the upcoming semester. I agree to provide any documentation necessary for completion of the voucher, which may include class schedule, enrollment sheet, grade report from previous semester, and Financial Aid Award letter.
- In the event that I drop or add a class, I will notify my case manager immediately.
- Upon completion of my training, I agree to provide my case manager with information concerning my employment and copies of any diplomas, credentials, or licenses earned.

**I have read this document and hereby understand and agree to comply with the terms herein described. I am receiving a copy of this agreement for my records.**

\_\_\_\_\_  
ITA Participant's Signature

\_\_\_\_\_  
Date

**I have established this ITA and reviewed the terms of this Agreement with the participant.**

\_\_\_\_\_  
WIA Program Operator's Signature

\_\_\_\_\_  
Date

# SAMPLE

**Attachment B**

## INDIVIDUAL TRAINING VOUCHER FORM

Training Institution \_\_\_\_\_ Mod # \_\_\_\_\_

Participant Name \_\_\_\_\_ ID Number \_\_\_\_\_

**WIA PROGRAM/TRAINING COST**

ADULT       YOUTH       DISLOCATED WORKER       OTHER  \_\_\_\_\_

\_\_\_\_\_  
(WIA Program Operator) agrees to sponsor the above named student in the course(s) or program(s) listed below and pay the training costs listed (based on off-the-shelf catalog prices) for the time period of \_\_\_\_\_ through \_\_\_\_\_. Refunds or returns for non-completion will be made to \_\_\_\_\_ (WIA Program Operator) .

**Explanation if this is a Modification:**

### TRAINING

COURSE No.	COURSE TITLE	HOURS

### AUTHORIZED TRAINING COSTS

ITEM	AMOUNT	ITEM	AMOUNT
Tuition	\$	Equipment &/or Tools	\$
Fees	\$	Uniforms	\$
Books	\$	Other	\$
<b>TOTAL</b>			<b>\$</b>

As a recipient of WIA Program assistance with tuition, fees, books, or required supplies, I hereby authorize the training institution listed above to release information concerning my attendance, grades, and schedules to \_\_\_\_\_ WIA Program Operator .

\_\_\_\_\_  
Participant's Signature

\_\_\_\_\_  
WIA Program Operator's Signature

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**COORDINATION OF TRAINING FUNDS**

Attachment C

**SECTION I**

TO: \_\_\_\_\_  
 SCHOOL: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  
 \_\_\_\_\_

FROM: \_\_\_\_\_  
 ATTENTION: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_  
 \_\_\_\_\_

**SECTION II**

Participant Name: \_\_\_\_\_

ID Number: \_\_\_\_\_

I hereby authorize the exchange of information between the WIA Case Manager and the Financial Aid Office at the above named School regarding the awarding of any financial aid from any source.

\_\_\_\_\_  
 Participant's Signature

\_\_\_\_\_  
 Date

**SECTION III (to be completed by Financial Aid Officer)**

**COST OF ATTENDANCE**

**Tuition** \$ \_\_\_\_\_  
**Fees** \$ \_\_\_\_\_  
**Supplies** \$ \_\_\_\_\_  
**Books** \$ \_\_\_\_\_  
**Tools** \$ \_\_\_\_\_  
**Uniforms** \$ \_\_\_\_\_  
**Other (Please Specify)** \$ \_\_\_\_\_  
 \$ \_\_\_\_\_  
 \$ \_\_\_\_\_  
 \$ \_\_\_\_\_

**STUDENT'S FINANCIAL AID**

**PELL Grant Eligibility** \$ \_\_\_\_\_  
 \_\_\_ was not eligible due to income  
 \_\_\_ was not eligible due to default  
 \_\_\_ training is not PELL eligible  
**OTAG** \$ \_\_\_\_\_  
**OHLAP** \$ \_\_\_\_\_  
**SEOG** \$ \_\_\_\_\_  
**Tribal/BIA** \$ \_\_\_\_\_  
**R.O.T.C.** \$ \_\_\_\_\_  
**Tuition Waiver** \$ \_\_\_\_\_  
**Vocational Rehabilitation** \$ \_\_\_\_\_  
**Scholarship(s)** \$ \_\_\_\_\_  
**VA/Military** \$ \_\_\_\_\_  
**Other (Please do not include loans)** \$ \_\_\_\_\_

**PERIODS COVERED:**

- |                                       |  |   |
|---------------------------------------|--|---|
| <input type="checkbox"/> Fall _____   | <input type="checkbox"/> Trimester I   | <input type="checkbox"/> Full Length of One Year Course |
| <input type="checkbox"/> Spring _____ | <input type="checkbox"/> Trimester II  |   |
| <input type="checkbox"/> Summer _____ | <input type="checkbox"/> Trimester III |   |

Cost of Attendance \$ \_\_\_\_\_ minus Student's Financial Aid \$ \_\_\_\_\_ equals unmet financial need \$ \_\_\_\_\_.

By signing below, the financial aid officer (or personnel who perform those duties) agrees to inform the local WIA program operator of the amounts and disposition of financial aid to each participant awarded after the enrollment of the participant, as part of a continuing, regular information sharing process.

\_\_\_\_\_  
 FINANCIAL AID OFFICER'S SIGNATURE

\_\_\_\_\_  
 DATE

**SECTION IV Alternate Sources of Funding (for WIA Office Use Only)**

\_\_\_\_ Yes Program \_\_\_\_\_ \$ \_\_\_\_\_  
 \_\_\_\_ Yes Program \_\_\_\_\_ \$ \_\_\_\_\_

I certify that funds are not available or are inadequate from other resources to ensure the participant's needs are met. After review of partner agencies, other social service agencies, and other community resources, I have determined that WIA funds must be used in the mix of available resources. I certify that WIA funds will be coordinated with other funds and there will be no duplication of resources.

\_\_\_\_\_  
 WIA PROGRAM OPERATOR'S SIGNATURE

\_\_\_\_\_  
 DATE

ITA19-2005/0506