

# Oklahoma Employment Security Commission



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## Oklahoma Employment and Training Issuance #17-2010

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

**FROM:** Richard J. Gilbertson, Director  
Workforce Integrated Programs Division

**DATE:** August 30, 2010

**SUBJECT:** Individual Training Account Policy

**PURPOSE:** To update policy and provide clarification regarding the establishment of Individual Training Accounts (ITAs), the requirements for the coordination with other funding sources, and the requirements for grant recipients to substantiate ITA expenditures. Specifically, this policy is updated to:

- announce the extension of waiver provisions which enable Workforce Investment Act (WIA) service providers to utilize the Eligible Training Provider List for Older and/or Out-of-School Youth through the use of an ITA; and,
- to include a revised Coordination of Training Funds form (Attachment C) removing VA/Military Benefits from the Student Financial Aid Category.

**BACKGROUND:** The Workforce Investment Act of 1998, in §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,” and further establishes, in §134(d)(4)(G) 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.” Training services must be linked to occupations that are in demand in the local area, or in another area to which an adult or dislocated worker receiving such services is willing to relocate. Section 134(d)(4)(B) of the Act explains that training services shall be limited to individuals who are unable to obtain other grant assistance for such services, including Federal Pell Grants or require assistance beyond the assistance made available under other grant assistance programs, including Pell Grants.

In response to a request by Oklahoma, the U.S. Department of Labor granted a waiver of the prohibition on the use of ITAs for Older and/or Out-of-School Youth found at 20 CFR Part 664 §664.510. This waiver was initially granted for the period beginning July 1, 2005, and ended June 30, 2007.

The waiver allows youth program participants who are now at least age 18, regardless of their age and status at enrollment, to select eligible training providers from the Eligible Training Provider List through the use of an

ITA, while retaining their “youth” classification. Oklahoma requested an extension of the waiver and the U.S. Department of Labor granted the extension with a current expiration date of June 30, 2011.

In addition, Oklahoma requested a waiver allowing the use of ITAs for Younger and In-School Youth in anticipation of the expiration of the State’s Work-Flex authority on June 30, 2010. The U.S. Department of Labor denied this request, clarifying that the extension of the waiver request for the use of ITAs with Older and/or Out-of-School Youth encompasses all youth who are now at least age 18, regardless of their age and status at enrollment. Youth younger than 18 who are participating in training funded by an ITA that goes beyond June 30, 2010, will be allowed to complete training without interruption.

**MESSAGE:** This policy will apply to any participant enrolled in the WIA Adult, Dislocated Worker, National Emergency Grant Program, and Older and/or Out-of-School youth receiving training through an ITA. Local Workforce Investment Boards (LWIBs) that requested and utilized a waiver for Younger and In-School Youth under the State’s Work-Flex authority, will also follow this policy for those youth that are currently receiving training through an ITA. The ITA is a tool for providing WIA Title I funded training services under WIA §134(d)(4)(G). 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 the allowable cost of attendance.

ITAs are established with WIA funds for participants who are unable to obtain grant assistance from other sources or require 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 adult and dislocated workers and may be established for older and/or out-of-school youth. Pursuant to Oklahoma’s waiver, Older and/or Out-of-School Youth may select eligible training providers from the Eligible Training Provider List through the use of an ITA. If ITAs are utilized for youth participants, Oklahoma’s waiver requires that funds used for ITAs must be tracked and reflected in the Individual Service Strategies for these youth.

## **Individual Training Accounts**

### **Establishment**

The authority for this policy derives from the Workforce Investment Act of 1998 which provides that, with limited exceptions, WIA training services for Adults and Dislocated Workers will be provided through the use of ITAs. A key reform tenet of WIA is that adult and dislocated workers who have been determined to need training may access training with an ITA if other funds are not available. The ITA enables them to choose among eligible training providers, thus bringing market forces into federally funded training programs. The ITA is established for eligible individuals to purchase training services from eligible training providers they select in consultation with the WIA service provider.

WIA §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.”

WIA §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. Accordingly, youth program participants who are now at least age 18, regardless of their age and status at enrollment, may select eligible training providers from the Eligible Training Provider List and through use of ITAs. 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 that provide skills in demand occupations as defined by Local Workforce Investment Boards 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)].

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:

- A. Funding stream;
- B. Amount paid by category;
- C. Total number of hours;
- D. Participant's signature and date; and
- E. WIA Service Provider'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 LWIB 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. However, contracts for services may be used instead of ITAs only when one of the following exceptions applies:

- A. When the services provided are on-the-job (OJT) or customized training.
- B. When the LWIB determines there are an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs. 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.
- C. When the LWIB 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 §134(d)(4)(G)(iv), which face multiple barriers to employment. The LWIB

must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the special participant population to be served. This criterion may include, but is not limited to:

1. Financial stability of the organization;
2. 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
3. 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 are included in one or more of the following categories:

- A. Individuals with substantial language or cultural barriers;
- B. Offenders;
- C. Homeless; and
- D. 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). An individual who has been determined eligible for training services may select a provider from the State Eligible Training Provider List after consultation with a WIA service provider. [20 CFR Part 633 §663.440(c)] LWIBs, through the local one-stop center, must make available to customers the State Eligible Training Provider List as required in WIA §122(e).

### **Local Board Policy**

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

- A. Those participants who have been determined to need training through WIA eligibility requirements and a properly developed IEP and ISS may access training through the use of an ITA.
- B. 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 is willing to relocate.
- C. How participants have access to the local board’s list of demand occupations or skills. The demand occupations or skills are to be contained in the local workforce development plan. Training in non-demand occupations is not allowable.
- D. How the ITA training services policy will be communicated in simple, understandable language to customers of the one-stop center.
- E. 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 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.
- F. 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. Because eligible training providers are the only entities that can receive ITA payments, if there are any training-

related costs not available through the eligible training provider those cost must be provided as a supportive service in accordance with LWIB's supportive service policy and procurement policy and not paid out of the ITA.

- Books, uniforms, tools, etc. purchased from the training provider are training-related costs and paid to the eligible training provider from the ITA Voucher.
  - Books, uniforms, tools, etc. purchased from a vendor are a supportive service cost.
- G. 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.
- H. Who will be responsible for establishing 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. The board must also establish:
- That Application forms are accessible online at [www.FAFSA.ed.gov](http://www.FAFSA.ed.gov);
  - That ITAs must not be established for training that is fully funded with TAA funds; and
  - If the board chooses to utilize the waiver approved by the U.S. Department of Labor or local board waiver approved by the State for youth ITAs, local policy must state how the funds will be tracked and reflected in the individual service strategies for these youth.

### **Documentation**

The following documents are minimum requirements for establishing an ITA:

- A. IEP or ISS with information documenting eligibility for training services; and,
- B. ITA Form (sample provided as Attachment A).

## **Coordination of ITAs with other Grant Assistance**

### **General**

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

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

WIA service providers 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 service providers 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 §663.320 (a) and (b)]. All financial resources, excluding loans but including WIA funds (training, training-related, and supportive service funds), cannot exceed the total cost of attendance as indicated on this form.

All WIA service providers will use the Coordination of Training Funds form (Attachment C) to provide documentation of the coordination between the WIA service provider, entities administering alternate sources of funds, and eligible training providers. Section III of 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. The Coordination of Training Funds form section III **cannot be altered** by WIA Service Providers. WIA Service Provider will complete section IV of the Coordination of Training Funds form, certifying that funds are not available or are inadequate from other alternate sources of funding, these funds listed in section IV will need to be subtracted from the unmet financial need determined by the Financial Aid Officer in section III to arrive at the adjusted unmet financial need.

Non-Pell eligible Training Providers do not calculate the unmet need in the same manner as Pell Eligible Training Providers. In the event the Coordination of Training Funds form section III indicates that the Training Provider is not Pell eligible and the unmet financial need determined by the Financial Aid officer equals the cost of attendance, LWIBs may authorize supportive service payment(s) in excess of the unmet financial need which would allow participation in WIA Occupational Skills Training.

A new Coordination of Training Funds form is required for each designated period of training. The training institution may do this per semester, annually, or by billing cycle for the type of training institution and the type of training they are providing.

WIA service providers, 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 service providers and eligible training providers must 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:

- A. WIA funds for training services are limited to instances when there is no or inadequate financial assistance from other sources;
- B. Participation in a training program funded under WIA may not be conditioned on applying for or using a loan to help finance training costs; and,
- C. Duplicate payments of costs when an individual is eligible for both WIA and other assistance (including Pell grants) must be avoided.

WIA §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 663 §663.320(c), the WIA service provider 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 service provider 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 663, 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 service providers 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:

- A. 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;
- B. 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), Trade Adjustment Assistance, one-stop programs other than WIA, etc.)
- C. How the WIA service provider will ensure that all financial aid resources, excluding loans but including WIA training and supportive service funds, will not exceed the unmet financial need for the corresponding period of training as determined by the financial aid officer (or those personnel who perform those duties) based on the Coordination of Training Funds form. The WIA service provider will coordinate the training dollars and supportive service dollar limits as set by the LWIB. (See example in the Question and Answer Section of this policy).
- D. How supportive services may be approved on a case by case basis for WIA participants attending programs provided by non-Pell eligible training providers.

**Note:** Non-Pell eligible training providers don't calculate the unmet need the same as Pell eligible training providers. In the event the Coordination of Training Funds form section III indicates that the Training Provider is not Pell eligible and the unmet financial need determined by the Financial Aid officer equals the cost of attendance, LWIBs may authorize supportive service payment(s) in excess of the unmet financial need which would allow participation in WIA Occupational Skills Training.

- E. Guidelines to determine and document, prior to training enrollment, that to the extent practical, available Federal, State, local, and personal resources are sufficiently coordinated 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.
- F. A methodology to determine the participant's training-related financial assistance needs, 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.
- G. Procedures and forms to authorize release of participants' financial aid information by post-secondary institutions.
- H. 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.
- I. 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 WIA service provider. 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. [WIA §134(d)(4)(G) and 20 CFR Part 663 §663.410]

### **Local Board Policy**

Local board policy must be established to provide for who will be responsible for:

- A. Establishing a written 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 procedure.
- B. Establishing a method for disbursement of funds — only eligible training providers on the State's Eligible Training Provider List are able to redeem ITAs for payment.
- C. Developing a written process for documenting the expenditures that is in accordance with the voucher and ITA.
- D. Developing a process for tracking WIA Title I expenditures paying for the individual's training, training-related, and supportive service cost.
- E. Developing a process for tracking total local area ITA obligations to ensure that the board's budget is not exceeded.

### **Documentation**

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

- A. A copy of the voucher, purchase order, invoice, source documentation, receipts, etc. that will support the payment mechanism.
- B. A tracking document (e.g., spreadsheet, report, etc.) to ensure locally board established funding limits have not been exceeded.
- C. A tracking document to ensure that training, training-related, and supportive services dollars do not exceed the unmet financial need for the corresponding period of training as determined by the financial aid officer (or those personnel who perform those duties) based on the Coordination of Training Funds form.

**ACTION REQUIRED:** Local board policy, reflecting the guidance provided herein, must be developed and implemented (i.e., put into use) no later than October 15, 2010. 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.

**RESCISSIONS:** OETI #15-2008

**INQUIRIES:** Refer inquiries to Jackie Younge at [Jackie.Younge@oesc.state.ok.us](mailto:Jackie.Younge@oesc.state.ok.us) (405-557-5314) or Tami Decker at [TDecker@oesc.state.ok.us](mailto:TDecker@oesc.state.ok.us) (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 Service Provider's signature and date.*)

Attachment C – Coordination of Training Funds Form (*This form is standard and must be used by all WIA service providers – it cannot be modified*)

- *Section I – to be completed by WIA Service Provider*
- *Section II – to be completed by WIA Participant*
- *Section III – to be completed by Financial Aid Officer*
- *Section IV – to be completed by WIA Service Provider (If it is determined that there are other alternate sources of funding, these funds listed in section IV will need to be subtracted from the unmet financial need determined by the Financial Aid Officer in section III to arrive at the adjusted unmet financial need.)*

Attachment D – Question and Answers

**SAMPLE**

Attachment A

**Individual Training Account (ITA)**

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

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

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

Training Program: \_\_\_\_\_

Demand Occupation: \_\_\_\_\_

**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.**

<b>ITA Participant's Signature</b>	<b>Date</b>
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**I have established this ITA and reviewed the terms of this Agreement with the participant.**

<b>WIA Service Provider's Signature</b>	<b>Date</b>
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"Equal Opportunity Employer (EOE)/Program"  
"Auxiliary aids and services are available upon request to individuals with disabilities"



**COORDINATION OF TRAINING FUNDS**

**SECTION I**

To: \_\_\_\_\_ FROM: \_\_\_\_\_  
 SCHOOL: \_\_\_\_\_ ATTENTION: \_\_\_\_\_  
 ADDRESS: \_\_\_\_\_ 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 (The following section is to be completed by the financial aid office)**

**COST OF ATTENDANCE**

**STUDENT'S FINANCIAL AID**

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

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

**PERIODS COVERED:**

Fall \_\_\_\_\_  Trimester I  Full Length of Short Course  
 Spring \_\_\_\_\_  Trimester II  
 Summer \_\_\_\_\_  Trimester III

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

**By signing below, the financial aid officer (or those 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 Date

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

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

Unmet financial need from Sec. III \$ \_\_\_\_\_ minus alternate funding from Sec. IV \$ \_\_\_\_\_ equals adjusted unmet financial need \$ \_\_\_\_\_.

I certify that funds are not available or are inadequate from other financial resources such as TAA 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 Service Provider's Signature Date

"Equal Opportunity Employer (EOE)/Program." and "Auxiliary aids and services are available upon request to individuals with disabilities."

## Questions and Answers

**Question:** I know that WIA participants have to apply for Pell Grant in order to receive WIA funds for training, but we have one training provider who is on the State Provider List in a demand occupation who does not receive Pell Grant funding from the Feds. Are we still required to use the Coordination of Training Funds form to utilize WIA funds for training cost?

**Answer:** Yes, even if the Training Provider is not eligible for Pell funding, they still need to complete section III of the Coordination of Training Funds form.

**Question:** The training provider is not Pell eligible, which they have documented on the Coordination of Training Funds form, and therefore does not use any type of formula to calculate the Total Cost of Training. And they only record the exact dollar for training (tuition, fees, and books) which is \$4000.00 on the Coordination of Training Funds form and the unmet need is \$4000.00. Is the WIA service provider only able to help with the \$4000.00 and no supportive services?

**Answer:** Non-Pell eligible Training Providers do not calculate the unmet need the same as Pell eligible Training Providers. So in the event the Coordination of Training form section III indicates that the Training Provider is not Pell eligible and the unmet financial need determined by the Financial Aid officer equals the cost of attendance (tuition, fees, and books), LWIBs may authorize case by case supportive payment(s) in excess of the unmet financial need which would allow participation in WIA Occupational Skills Training.

**Question:** Are ITAs allowed for youth participants?

**Answer:** Yes, On July 7, 2005 the State of Oklahoma was granted a waiver of the prohibition on the use of ITAs for Older and/or Out-of-School Youth at 20 CFR Section 664.510 through June 30, 2011. Pursuant to Oklahoma's waiver, Older and/or Out-of-School Youth may select eligible training providers from the Eligible Training Provider List thru the use of an ITA.

**Question:** Can an ITA be used for an older youth even though he is classified as in-school... (he was originally enrolled as an IS Youth and is now 19)?

**Answer:** ITAs cannot be utilized for youth that were originally enrolled as a younger youth and/or in-school youth. However, under the state's Work-Flex authority, Workforce Investment Boards may request and be granted a waiver to allow the use of ITAs to include youth that were enrolled as younger or in-school youth but now meet the minimum qualifications for enrolling in post-secondary education.

**Question:** There appear to be two categories of supportive services: training-related and personal. The second sentence of item F on page 5 reads "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 exceed the unmet financial need that was determined by the financial aid officer.”

**Answer:** OESC has not defined two categories, we are saying that there are cost that are not tuition cost (books, uniforms, tools, etc) that can be paid directly to the Eligible Training Provider, thru the ITA that are required to complete the training. If those items are required and are not available through the Eligible Training Provider they must be provided as supportive services.

**Question:** Our (the local WIA area’s) interpretation is that training costs directly paid to the eligible training provider and “training related” supportive services (i.e. tuition, fees, books, equipment/tools, uniforms, supplies, and travel/lodging) required by curriculum must not exceed the unmet financial need as indicated on the Coordination of Training Funds form. That does not include “personal” supportive services such as groceries, rent, etc.

**Answer:** No, it includes all supportive services. Training related costs are paid thru the ITA with an ITA training voucher, OESC has not referred to them as training related supportive services. If the required training related cost is not available at the Eligible Training Provider then it must be provided as a supportive service. This simply means that it is not paid through an ITA voucher or deducted from the ITA amount. It is processed and tracked as a supportive service in accordance with LWIB policy. The training costs and the supportive service costs together cannot exceed the unmet financial need for the period of training that is reflected on the Coordination of Training Funds form.

**Question:** Most of the training institutions we work with fill out the Coordination of Training Funds form on a semester (not yearly basis). Whatever the time frame, would we start with the new “unmet financial needs” amount and work with the customer.

**Answer:** Yes, a new Coordination of Training Funds form is required each designated period of training. The financial aid officer at the training institution will be responsible for determining the participant’s cost of training and unmet financial need. The Coordination of Training Funds form section III must be completed by the financial aid officer, which will show the cost of training and the unmet financial need. OESC will be monitoring to make sure that the payments of training vouchers and supportive services (training related cost and/or personal) do not exceed the unmet financial need which is listed on the Coordination of Training Funds form. Also, making sure that LWIB ITA and supportive service policy limits are not exceeded. (Additional budget forms will not be accepted to arrive at the unmet financial need amount)

All financial resources, excluding loans, including WIA funds (training and supportive service funds) cannot exceed the total cost of attendance. If the participant's unmet financial need has already been met by the combination of funds, additional supportive services funds cannot be expended on behalf of that participant. And even though the training institution fills out the Coordination of Training Funds form on a semester basis instead of yearly, you would still need

to follow your LWIB policy for training cost limits and supportive service limits for the individual's total unmet financial need.

**Example:**

Financial Aid Officer completes a Coordination of Training Funds form each semester for a WIA participant that is going to be attending training. The unmet financial need for each semester ends up being \$5,000 ( $\$5,000 \times 4$  semesters) which would equal \$20,000. The Board's ITA limit is \$7,000 per participant and the Board's supportive service policy limit is \$2,000 per participant. The limit of WIA funds that can be used towards the unmet financial need would be \$9,000.

In the above example the WIA service provider would have to decide how to best apply the dollar limits. (Do you spend it all in one semester or stretch it out over several semesters?) It is very important for the WIA service provider to determine if the participant is financially capable of attending training before enrolling them into a training program. Regardless, WIA service provider cannot exceed Board established ITA or supportive service dollar limits.