

KCDEE- POLICIES AND PROCEDURES MANUAL

KCDEE & River Valley Workforce Investment Board

POLICY & PROCEDURES MANUAL RELEASE

To	All WIA Title 1, and WIA Title1 Subrecipients	SUBJECT AREA	WIA Employment & Training
From	KCDEE Administration	POLICY NUMBER	CM 07-01
Date	9/19/2007	EFFECTIVE DATE	7/1/07

SUBJECT INDIVIDUAL TRAINING ACCOUNT – OLDER YOUTH/OUT-OF-SCHOOL YOUTH

PURPOSE

To transmit policy that will permit Individual Training Accounts to be used by for the following youth populations: Youth ages 16 and over and out-of-school youth who are receiving services under WIA Title 1.

REFERENCES

WIA Policy Letter No. 07-PL-38

BACKGROUND

In response to a request by Illinois Department of Commerce and Economic Opportunity (DCEO), the U.S Department of Labor (USDOL) has issued a waiver of the prohibition on the use of Individual Training Accounts (ITAs) for youth found at 20 CFR 664.510. This waiver was initially granted for the period beginning July 1, 2003, and ending June 30, 2004. The waiver allowed older youth participants and out-of-school youth participants to select approved ITA programs from the Eligible Training Provider List, while retaining their “youth” classification. Extension was granted for the periods beginning July 1, 2004 and ending June 30, 2005 and beginning July 1, 2005 and ending June 30, 2007. Recently, DCEO requested another extension of the waiver and USDOL has granted this extension with an expiration date of June 30, 2009.

The waiver, designed to enhance customer choice, allows these two populations (older youth and out-of-school youth) to benefit from services provided by Illinois’ certified training providers, and expand services without requiring One-Stop operators to register participants in the adult program and track resources separately for each funding stream. The waiver grants the state and local area boards flexibility in program design of high quality youth services that will increase customer choice and access to training in demand occupations.

The youth waiver and extension are incorporated by reference into the State’s WIA Grant Agreement with the U.S. Department of Labor. *Waiver approval constitutes a modification of the State and local five-year strategic plans.*

DEFINITIONS:

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Eligible Youth	An individual who is: a) age 16 through 21; b) a low-income individual; and c) within one or more of the following categories: <ol style="list-style-type: none">1) deficient in basic literacy skills;2) school dropout;3) homeless, runaway, or foster child;4) pregnant or parenting;5) offender; or6) is an individual, including a youth with a disability, who requires additional assistance to complete an educational program or to secure and hold employment.
Older Youth	An individual who is an eligible youth age 19 through 21.
Out-of-School Youth	An eligible youth who: a) is a school dropout; or b) has received a secondary school diploma or its equivalent but is basic skills deficient, unemployed or underemployed.
School Dropout	An individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent. A youth's dropout status is determined at the time of registration. A youth attending an alternative school at the time of registration is not a dropout. An individual who is out-of-school at the time of registration and subsequently placed in an alternative school may be considered an out-of-school youth for the purposes of the 30 percent expenditure requirement for out-of-school youth.

POLICY

As a result of the waiver extension, the State is revising its policy on Individual Training Accounts (ITAs) to permit the eligible youth and the out-of-school youth populations to select approved ITA programs from the eligible training provider list while retaining their youth classification. The revised policy is as follows:

- A. The youth must meet criteria specified in the Title I Training Provider Certification Policy Guide, including the following:
 - Training must be in an occupation for which there is demand.
 - An individual must have the qualifications to succeed in the program.
 - Funding must be available.
 - The case manager must have determined that occupational skills training through the ITA system is necessary in order for the youth to secure full-time employment that leads to self-sufficiency
- B. The use of ITAs should offer options for customer choice and not be used as an enticement to terminate traditional academic programs.
- C. The use of ITAs will require a comprehensive plan for service delivery in accordance with local area recommendations.

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- D. The use of ITAs will enhance, not supplant, current delivery systems or the implementation of the required elements for youth programs.
- E. Enrollments must occur no earlier than July 1, 2007, and no later than June 30, 2009.
- F. Local areas must evaluate performance measure outcomes at least quarterly to determine any impact of the waiver.
- G. Planning documents will reflect the core indicators of performance for employment and training activities authorized under WIA Section 134 and WIA Section 136(b)(2)(A), only as they relate to ITAs, i.e., the waiver does not affect any allowable WIA activities and older youth and out-of-school youth will fall into the youth performance measures, as appropriate.
- H. The requirements of WIA Section 129(c) relating to the provision of services to eligible youth remain applicable. Thus:
 - Determination to use an ITA must be based upon the development of an objective assessment and individual service plan as outlined in WIA Section 129(c) (1) (A).
 - The services outlined in WIA Section 129(c) (2) must be made available to those youth for whom ITAs are not deemed suitable or who require additional comprehensive services.
 - Procurement of these services must be consistent with the competitive selection requirements of WIA Section 123.

REQUIREMENTS

- Only requests for youth, currently registered in WIA 1Y services, who are actively participating in completing goals identified through their Individual Service Strategy (ISS), will be considered for ITAs.
- The use of an ITA will require an objective and thorough assessment and comprehensive plan for service.
- Only sub-recipients mandated by the Youth Council to add new or additional enrollments can make referrals for ITA consideration.
- Sub-recipient should assist in selecting the type of training but not identifying the vendor that will supply the training.
- Training must be selected from the State approved provider list.
- Training cap will be the maximum approved by the Local Workforce Investment Board.
- All potential students must apply for financial aid before registering for training. Proof of the financial aid application must be included in the student's file.
- The use of an ITA should offer options for customer choice and not be used as an enticement to terminate traditional academic programs.
- The use of an ITA should enhance, not supplant the current delivery systems or the required elements for youth programs.
- Enrollments may occur from the date of issuance of this policy through June 30, 2009.

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- Performance measures will remain under youth performance measures as appropriate.
- Performance measure outcomes will be evaluated quarterly to determine any impact from the use of ITAs.
- Trainee will be entitled to supportive services as deemed necessary under the KCDEE/River Valley Workforce Investment Board (WIB) Supportive Service policy CM 03-02.
- Sufficient funding for an ITA must be available in the WIA Title 1-B KCDEE youth budget.
- Staff involved in the youth ITA process must be knowledgeable about youth assessment, development of individual service strategies, integration of needed services, provisions of follow-up services, and explicit documentation of services and outcomes.
- Staff should ensure that training funds will be prioritized for eligible youth pursuing high growth opportunities and that training investments meet industry-specific requirements leading to an industry-recognized credential, when appropriate.

PROCEDURES

- Sub-recipients will work with the youth to research the career area, including employment outlook upon completion using available labor market information.
- Sub-recipients will conduct a thorough assessment determining the need for training.
- Sub-recipients will develop a plan for service (ISS) to ensure participant's successful completion of requested training, including attainment of appropriate youth performance measures.
- Once completed, the sub-recipient should submit the above documentation to the Director of Workforce Operations or designee for staffing.
- The documentation and ITA referral will be reviewed by the Director of Workforce Operations or designee to determine appropriateness. Youth may be interviewed as a part of the staffing process.
- If deemed appropriate, KCDEE staff will issue the ITA using the existing procedures for issuing adult/dislocated ITAs. KCDEE adult case manager will be assigned to work with KCDEE youth representative to complete ITA as needed.
- Training contract should be completed by KCDEE youth representative.
- Tools, equipment and supplies agreement should be completed by KCDEE representative if and when appropriate.
- Sub-recipient representative and parent of youth (if youth is under 18 years old) should be present when the ITA, training contract and tools, equipment and supply agreement (if needed), are completed.
- Youth will remain the responsibility of the youth sub-recipient. A copy of the completed ITA packet should be given to the KCDEE representative.

EFFECTIVE DATE

JULY 1, 2007

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EXPIRATION

Enrollment in approved ITA programs must occur no later than June 30, 2009

ATTACHMENTS

1. Individual Training Account for PY'07
2. Training Program Contract
3. Training Tools, Equipment, Supplies Agreement