



CITY OF OAKLAND

OFFICE OF ECONOMIC AND WORKFORCE DEVELOPMENT

OAKLAND WORKFORCE DEVELOPMENT BOARD



DIRECTIVE #: 22-002
TO: All Workforce Innovation and Opportunity Act (WIOA) Funded Oakland Workforce Development Board (OWDB) Service Providers
EFFECTIVE: Retroactive to July 1, 2022
SUBJECT: Individual Training Account (ITA) Policy and Procedures

Purpose

An Individual Training Account (ITA) is designed to provide services to participants who are in need of training that prepares them for employment in demand occupations for the City of Oakland Workforce Development Board (OWDB). Participants may access training services through training providers who have met eligibility requirements set by the State in order to be listed on the State-managed Eligible Training Provider List (ETPL).

The ITA Policy and Procedures is designed to ensure consistency among Training Service Providers and streamline the process for customers to obtain an ITA while ensuring the intent of the legislation for informed customer choice is still being met. The policy defines the Workforce Innovation and Opportunity Act (WIOA) tiers of service and outlines the process to issue, document, and track an ITA.

Definition of Services

Under the WIOA there are two levels of services: Basic and Individualized services. A determination that a customer needs individualized and/or training services can be made without regard to how long the individual has been receiving services at each level.

Training Services

Training services are available to those participants who are unable to find employment. WIOA participants must meet eligibility requirements before being provided training services.

Need and ability to benefit from WIOA funds must be established and the customer must have the skills and qualifications to successfully complete the training program.

1. Assessment

An individual's need for training shall be determined through an assessment. Training fund disbursement priority will be given to participants that have been identified through the WIOA enrollment process as meeting the definition of a WIOA Priority of Service Category. (Please reference OWDB Directive 16-007 WIOA Priority of Service Policy for detailed guidelines). WIOA Priority of Service groups are as follows, and participants must be served in the following order:

- A. Veteran's and their Eligible Spouses
- B. Individuals receiving Public Assistance or other Low-Income Individuals, Individuals determined to be Basic Skills Deficient, Re-Entry/Formerly Incarcerated and Oakland Residents residing in High Unemployment areas (as defined by Zip Code).
- C. All other WIOA eligible individuals not defined above.

Participants with marketable skills within an in-demand occupation shall not be deemed eligible for WIOA funded training. Training programs must be directly linked to demand occupations in the City of Oakland area and lead to employment paying at least the Oakland minimum wage.

2. Funding of Last Resort

Under WIOA, ITAs will be used when training at no cost cannot be found or provided in a timely manner. Participants must meet the financial need requirement of being unable to obtain grant assistance from other sources to pay partial or full costs of such training.

All other training options and funding sources shall be exhausted prior to utilizing WIOA ITA funds. America's Job Center of California (AJCC) staff shall monitor and track each customer's financial aid. ITAs will provide participants the maximum customer choice in services and in training schools, and the flexibility needed to obtain training in demand occupations in the changing economy of the City of Oakland. Each AJCC Operator shall be accountable for developing and managing an ITA process that provides training opportunities to participants who express an interest in, and need for, training opportunities. AJCC Operators must show evidence of exhausting all other funding sources through documentation in CalJOBS.

3. ITA Training Cost Per Participant

The ITA cap shall not exceed \$6,000 for any customer and \$50,000 for an individual training organization in a fiscal year. For occupations that are in very high demand, the ITA request for a higher amount may be requested on a case-by-case basis (request must be submitted to the OWDB Program Analyst for approval). The ITA cap in place at the time of the ITA Authorization must be adhered to without exception.

4. ITA Research

Following assessment and identifying the need for training, the customer shall begin training research to identify the most appropriate ITA provider and training for their skills, interests and aptitude.

- A. Participants shall complete research on training providers. If the school or training provider is located outside of Oakland, the customer is required to complete a physical site visit to a minimum of one school or training provider (if they are not attending online/distance learning) to determine if the facilities are adequate and accessible. The customer must consider transportation, classroom setting, and if applicable, necessary accommodations for persons with disabilities. Research may be conducted at just one school at the discretion of the AJCC Operator to streamline the ITA process. The justification for a waiver to complete research of only one school or training provider must be documented in CalJOBS.

- B. AJCC staff will enter two CalJOBS case notes with the following subject line: Priority of Service Determination (Eligible or Ineligible) and ITA Research (ITR) under the appropriate grant.
- C. The customer's CalJOBS file must contain documentation that indicates the customer has been screened for WIOA Priority of Service and the requirements for training services have been completed with specific detail as to the schools the customer researched.
- D. The customer's CalJOBS file must contain documentation that indicated Labor & Job Market Information to complete due diligence regarding the feasibility of obtaining employment upon completion of the chosen training program. Participants must determine whether the selected training program meets all employment requirements, (i.e. credentialing, internship, skill standards).
- E. AJCC Staff must ensure that the training selected by the customer is in OWDB-defined high-priority industry sectors. These Priority Employment Sectors must be indicated on the ITA Worksheet and documented in CalJOBS. Priority industry sectors are:
 - a) Advanced Manufacturing
 - b) Healthcare
 - c) Transportation, Distribution and Logistics (TDL)
 - d) Information and communications technologies (ICT)
 - e) Green technology and climate resilience
 - f) Food and beverage production
 - g) Construction
- F. If the customer is requesting training outside the identified WIOA Priority Sectors, there must be documented approval from OWDB Staff with verified fund availability from OWDB.

5. Documentation of ITA for WIOA Participants

When the customer has completed research and has chosen a training program, the AJCC staff shall retain the following documentation:

- CalJOBS ETPL Training Course printout
- Training Provider Agreement (provided by school)
- AJCC staff shall enter the ITA activity (no more than 29 days after start date)
- Any additional case notes pertaining to selection of training programs as appropriate

6. Start of ITA Training

A. Upon the customer's start date of training, AJCC staff shall confirm that the customer started training and shall document confirmation with a CalJOBS Activity. The following sample case note shall be used:

- a) **(Activity 300)** On Date I called Name of School to verify that Name of Customer started training on Date. I spoke with Name of Contact and Contact's Title. Name of Contact verified that Name of Customer attended training program on intended start date.
- b) The above printed CalJOBS Activity may accompany the ITA Invoice in lieu of an attendance report in order to adhere to timely submittal of invoices.

- c) The AJCC staff shall forward the ITA Authorization Form to the training provider for signatures. The ITA Authorization Form shall be signed and dated on or after the customer's training start date.
 - B. AJCC staff shall enter the CalJOBS activity code 300 under the appropriate grant. The appropriate training type shall be selected in the detail section of the activity code. The AJCC staff shall enter the ITA amount used in the detail section of the activity code 300.
7. ITA Modifications and Cancellations

An ITA modification occurs when there is a change to the ITA that affects the training program, training dates, and/or cost. An ITA requiring a cost change shall be documented with case notes in the participant file. ITA revisions must be made by putting one line through the incorrect information, adding the correct information, and initialing the change. Under no circumstances may white out be used on an ITA authorization.

An ITA cancellation occurs when a participant in training no longer continues the program and a cost has still been incurred. The amount should still be billed accordingly, and the CalJOBS activity code 300 completion status marked "dropped out of activity".

An ITA Modification or Cancellation form should be submitted to OWDB Staff.
8. ITA Refunds
 - A. Each AJCC should adhere to training provider refund policy.
 - B. In the event of a school closure, the school must inform AJCC Staff of the planned closure and refund the AJCC the unused WIOA training funds.

Attached Exhibit

Exhibit A – OWDB ITA Authorization Form

References

- The Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law (Pub. L. 113-128)) Title I and III, enacted July 22, 2014;
- Title 38 United States Code (38 U.S.C. 4213);
- TEGL No. 10-09, "Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in whole or in part by the U.S. Department of Labor (DOL)," dated November 10, 2009;
- WIOA section 3(24)
- WIOA section 134 (c)(3)
- DOL TEGL 3-15 Priority Populations under WIOA and Priority for Adult Funds
- DOL TEGL 22-04
- EDD WSD21-03 - ETPL Policy and Procedures

Any discrepancies arising between OWDB policy and or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. OWDB policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will OWDB policy and or procedures not meet minimum federal and state policy.

Action Required

This information should be disseminated to all current OWDB WIOA service providers and their staff.

Inquiries

Questions regarding this policy should be directed to the Oakland Workforce Development Board:

City of Oakland Economic & Workforce Development
c/o Executive Director – Workforce
250 Frank Ogawa Plaza, Suite 3315
Oakland, CA 94612
or
OWDB@oaklandca.gov