



WORKFORCE INNOVATION AND OPPORTUNITY ACT

Individual Training Account Policy

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**Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area
Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area
Jefferson County, Stephens County, and City of Duncan Labor Market Area**

Individual Training Account Policy

PURPOSE: To establish South Central Oklahoma Workforce Board's (SCOWB) policy for the Individual Training Account (ITA) to comply with Oklahoma Workforce Development Issuance (OWDI) #19-2017 Change 1

BACKGROUND: The Workforce Innovation and Opportunity Act of 2014, in §134(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(G)(i) 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 (DLW) receiving services is willing to relocate. Training services shall be limited to individuals who are unable to obtain other grant assistance, including Federal Pell grants or require assistance beyond the assistance made available under other grant assistance programs.

POLICY: This policy applies to any customer enrolled in the WIOA Adult, Dislocated Worker, Youth or National Emergency Grant receiving training through an ITA.

The focus of WIOA is helping individuals gain unsubsidized employment that leads to self-sufficiency. The quickest route from where an individual is to unsubsidized employment that leads to self-sufficiency should be the standard.

ELIGIBILITY FOR TRAINING SERVICES

Occupational Skills Training (OST) services may be provided to adult, dislocated worker (DLW) or out-of-school youth (OSY) ages 16 to 24 who, after an interview, evaluation/assessment, and career planning:

- are determined unlikely or unable through basic or individualized career services and in need of training services, to obtain or retain employment that leads to economic self-sufficiency, or wages comparable to or higher than previous employment
- are determined to have the skills and qualifications to successfully participate in the selected program of training services; and
- select, in consultation with SCOWB service provider staff, OST programs available through an eligible training provider (ETP) that are linked to in-demand occupations in the South Central Oklahoma Workforce Development Area (SCOWDA).
- are unable to obtain other grant assistance for such services, including State-funded training funds, Tribal funds, TAA, TANF, or Federal Pell Grants, or require assistance beyond that available through other workforce partners, educational entities or other grant assistance programs, including Federal Pell Grants, State-funded training programs, Tribal entities, scholarships, and other sources of education and/or training funds. LWDBs and service providers must ensure the coordination of funds available to pay for training, taking into consideration the following:
 - Pell grants and other grant assistance must be utilized first for the cost of training and mandatory fees;
 - Title I funds may be used to supplement a Pell grant and/or other grant assistance that does not cover the entire cost of tuition and mandatory fees, but may not supplant a Pell or other grant assistance;
 - Training services may be provided to an individual while an application for a Pell Grant is pending, as long as arrangements have been made with the training provider and the WIOA participant regarding allocation of the Pell Grant. If the individual is subsequently awarded a

Pell Grant, the training provider must reimburse the local area the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any tuition and education fees the training provider charged to attend training, from the Pell Grant award. Reimbursement is not required from the portion of the Pell Grant disbursed to the WIOA participant for other education-related expenses, per 20 CFR § 680.230;

- The full cost of participation in training services may be taken into consideration, including the cost of support services and other appropriate costs related to training program attendance, as defined by the LWDB;
- VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training do not preclude a veteran or the veteran’s eligible spouse from receiving WIOA funded services, including training funds. WIOA program operators may not require veterans or spouses of veterans to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training;
- Individuals who are members of a group covered under a petition filed for TAA and are awaiting a determination may be co-enrolled in Adult and/or DLW programs. If the TAA petition is certified, the worker will transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA; and

****For training services provided through the Adult funding stream, are determined eligible in accordance with the Adult Priority of Service as described in in this issuance and per local policy.****

Participants, with assistance from WIOA Service Provider Staff, are expected to utilize information such as skills assessments, labor market information (LMI), training program information and ETP performance to make an informed choice, and for participants to take an active role in managing their employment future through the use of ITAs.

Any previous assessments or evaluations conducted by another education or training partner within the last six months should be used when making training determinations as related to academic levels, skill levels and service needs. All assessment scores must be entered in the appropriate section of the online case management system.

ITA funds are not an entitlement and ITA funded training services will be limited to participants who:

- complete an individual employment plan (IEP) or individual service strategy (ISS) that identifies the selected training course and career path, if applicable;
- are unable to obtain other grant assistance or who have an unmet need beyond what is available through federally or state-funded education and training (E&T), other workforce partners, educational entities or grant assistance programs, excluding veterans administration (VA) benefits;
- select training programs linked to occupations that are in-demand in the South Central Oklahoma Workforce Development Area;
- maintain satisfactory progress/grades of 2.0 or higher throughout the training program;
- complete an orientation from SCOWB service provider staff of participant responsibilities for an ITA. SCOWB ITA Acknowledgement and Agreement (Attachment A) must be used and uploaded to the online case management system.

Any returning participants being enrolled in a WIOA funded program must have board approval for a second ITA.

Per OWDI-07-2020 WIOA programs and services must not be denied solely due to an individual's Federal Student Loan being in default status. However, workforce staff must counsel WIOA applicants and participants that training providers are not required to admit, enroll, or provide other financial assistance to individuals who are in default status.

INDIVIDUAL TRAINING ACCOUNTS

Individual Training Accounts (ITAs) are the primary method to be used for procuring training services under WIOA. An ITA is a payment agreement with an eligible training provider (ETP), established on behalf of a WIOA program participant. Training services must be linked to in-demand occupations and must be provided in a manner that maximizes the individual's choice in the selection of a training provider. Through consultation with the WIOA service provider staff, including discussion of program quality and ETP performance information, the program participant is able to make an informed choice when selecting a training provider and program. Once an individual has been determined eligible for training services and, in consultation with their case manager, selects an eligible training provider and program from the ETPL, a referral is made to the training provider and arrangements for payment of the training services are made through an ITA, utilizing an ITA Training Voucher (Attachment B).

Every effort should be made to establish the ITA in a timely manner once the individual has been determined eligible for Adult or Dislocated Worker training services. Once program eligibility has been determined, training funds must not be prorated after the ITA has been established and signed by the case manager and the participant. Lack of case management follow-through, regardless of the reason (e.g., staff shortages, case management mistakes, delayed approvals by the Service Provider when all information for eligibility has been provided, delays in processing payments, etc.), is not an acceptable reason to prorate payments. However, when an individual has been participating in a program of training prior to applying for title I WIOA training services, the cost of training must be prorated to the date the ITA was signed by the participant.

The ITA Agreement will inform the participant of the amount of WIOA financial support that SCOWB will make available on his/her behalf, inform SCOWB and the service provider which eligible training provider and demand occupation the participant has selected for training, and inform SCOWB and the service provider of the beginning and end dates of the training program. Additionally, the ITA Agreement (Attachment A) outlines the participant's responsibilities to the WIOA program and SCOWB.

ITA EXCEPTIONS

There are exceptions to the use of an ITA for WIOA training:

1. When services provided are on-the-job training or customized training;
2. When SCOWB determines that there are an insufficient number of eligible providers in its area to accomplish the purpose of a system of ITAs; and
3. When SCOWB determines there is a community-based or other private organization with a training program that serves special participant populations with demonstrated effectiveness.
4. When SCOWB enters into a pay-for-performance contract consistent with Sec 683.510.
5. When SCOWB determines that it would be most appropriate to contract with an institution of higher education or other eligible provider of training series will facilitate the training of multiple individuals in in-demand industry sectors occupations, provided that the contract does not limit consumer choice.

In addition to the contract exceptions to an ITA, a LWDB may determine that a combination of ITAs and contracts is an effective approach for placement into programs such as Registered Apprenticeship (RA) and other work-based training.

DEVELOPMENT

SCOWB ITAs will be awarded to participants to provide the costs of tuition, fees, books, and other training-related costs associated with participating in a program of training or education funded in whole, or in part, by WIOA funds. The ITA will be established only for the training and training-related costs specifically required by the eligible training provider and paid to the training provider. Any authorized WIOA training-related cost for goods or services not available or provided through the training provider will be requested and paid for as a WIOA supportive service in accordance with the local supportive service policy.

WIOA Title I case managers provide an orientation explaining SCOWB's ITA policy to customers of the one-stop center. The policy and procedures will be explained in simple language to promote customer understanding. During the IEP or ISS development process counselors/case managers and the individual will review SCOWB's commitments and what is expected of participants awarded an ITA. Participant expectation and the ITA guidelines are provided as Attachment A to this policy along with the other forms needed to complete an ITA.

Participant Responsibilities

- The customer will authorize the release of his/her financial aid information by the training institution to WIOA staff or an ITA will not be awarded.
- Participants will apply for and establish eligibility for Higher Education Act Title IV funds and other forms of financial aid before an ITA is awarded. As a last resort, participants will be made aware of the online applications process at www.FAFSA.ed.gov or they may be provided a paper application form if they prefer. Any needed assistance in completing and submitting the forms will be provided by the Service Provider staff.

Development of an ITA is not required when training is fully funded with TAA or other non-WIOA funds.

- Individuals who are members of a group covered under a petition filed and awaiting determination for Trade Adjustment Assistance (TAA) may be co-enrolled in Adult and/or Dislocated Worker. If the TAA petition is certified, the worker will transition to TAA approved training. If the TAA petition is denied, the worker will continue training under WIOA Title 1 Subtitle B.

CUSTOMER CHOICE

Although WIOA allows for "customer choice", the WIOA Service Provider Staff and participant should discuss all costs related to the training (for example: distance to training, transportation to training, cost of training programs available to be funded, child care needs, etc.). This ensures efficient use of federal WIOA taxpayer funds. A detailed program note must be entered to document the conversation.

ITAs will only be developed for training programs that are related to a demand occupation or are related to the training or education requirements of an industry sector identified by SCOWB as vital to the area's economy or those in another area in which the individual is willing to relocate.

SCOWB's Demand Occupation List is available on the SCOWB website (<http://scowib.info/>) and in Oklahoma Works American Job Centers. Skills required of those occupations are discussed with the participant during the development process of an IEP or ISS. Training is for demand occupations only.

SCOWB ITAs will only be used for schools or institutions on the State Eligible Training Provider List. A customer who has been determined eligible for training services may select any provider from this list after consultation and joint agreement with the WIOA counselor/case manager. The State Eligible Training Provider List is published on the OKJobMatch website (<https://okjobmatch.com/>) and is easily accessible at all Oklahoma Works American Job Centers or from any computer with internet access.

COORDINATION OF TRAINING FUNDS AND RESOURCES

Students who are awarded Pell grants or other grant assistance may benefit from a combination of the Pell grant with WIOA training funds or WIOA-funded supportive services and/or needs-related payments, when the cost of training exceeds the amount of the Pell and any other financial aid. Service provider staff must ensure sufficient documentation of the coordination of resources is maintained for each participant, including but not limited to, the following:

- whether an individual received a Pell grant or other grant assistance for the cost of training;
- for individuals not Pell eligible, the reason for ineligibility, e.g., the participant is in default status, the short term training program does not qualify, ineligibility due to household income, etc.;
- a list of all funding sources considered and the availability of the resource; and
- a list or budget of the participant's estimated monthly living expenses used to determine financial need, excluding any costs associated with alcohol, cigarettes, and entertainment.

WIOA funds utilized prior to a Pell or other grant assistance intended for education and/or training will be determined disallowed costs.

The WIOA Service Provider Staff must, to the extent possible, coordinate funding for ITAs with funding from other Federal, State, local, or private job training programs or sources to assist an individual in obtaining training services. Prior to the development of an ITA, an individual's "unmet need" must be determined. Service provider staff may take into account the full cost of participating in training services, including supportive services and other appropriate costs related to attendance in a training program, when determining an eligible individual's unmet need. Unmet need is defined as the cost of training not covered by grant assistance, educational entities, foundations, or other workforce partners. Unmet need must be documented on a Coordination of Training Funds (COTF) form (Attachment C), which is completed by the training provider. The cost of training supported by an ITA and the supportive services determined necessary to participate in career services and/or and training services, including needs related payments, may not exceed the participant's unmet need.

Adequate documentation of the coordination of resources is required and must be maintained for each participant including, but not limited to, the following:

- any grant assistance for the cost of training applied to and received or denied,
- any reason for Pell Grant ineligibility, if applicable,
- list of all funding sources considered and availability of the resource; and
- a budget of the participant's estimated monthly living expenses used to determine financial need, excluding any costs associated with alcohol, cigarettes, and entertainment.

All assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities, or other grant assistance, must be documented in the online case management system.

Eligible training providers (ETPs) offering short term training programs that are not Pell eligible generally document only the direct cost of training (i.e., tuition and mandatory fees, books, equipment, cost of exams and licenses, etc.) on the COTF form. In the event the COTF form indicates the training program is not Pell eligible and the unmet financial need equals the cost of attendance, the service provider may provide supportive services in excess of the amount documented as unmet financial need on the COTF as long as the supportive service(s) is required to allow the client to participate or continue in the approved program of

training and is documented as a need in the participant's IEP. It must be noted that all ETPs must complete Section II of the COTF form, as stipulated in The Coordination of Training Funds Form section, below.

Eligible training providers must enter other financial aid on the Coordination of Training Funds (COTF) form. However, as training providers may not always be aware of all resources available to every individual, other funding streams/resources must be explored to ensure the participant is unable to obtain grant assistance from other sources to pay for the cost of training. When it has been verified that no other funding is available for training, a program note must be entered to document how the determination was made.

COTF FORM REGULATIONS

Local WIOA staff are not authorized to change information entered by the financial aid officer (or the training facility's appropriate designee) in Section II. If corrections are needed, the training provider is required to complete a new COTF form or the financial aid officer/designee may make corrections to the original COTF, initial each correction, and provide a new signature.

The process for completion of the COTF form is explained below:

- Section I of the COTF form must be completed by the WIOA case manager, signed by the WIOA participant requesting training, and sent to the financial aid office of the appropriate training entity.
- Section II must be completed by the financial aid officer (or the training entity's designated staff) and returned to the case manager. Section II must include all known financial resources, with the exception of loans and VA benefits for education and training.
- Section III is then signed by the case manager, attesting that WIOA funds are necessary for the completion of the individual's employment goal(s).

A new COTF is required annually at a minimum and all semesters must be covered on the COTF.

TRAINING VOUCHERS

Payments of ITAs are made to the training institution incrementally through payment of a portion of the costs at different points in the training course. The WIOA service provider will be responsible for ensuring that the following processes are adhered to:

- a. Access to training services is facilitated by use of the Individual Training Voucher form – Attachment B. This form provides information about expenditures for tuition, books, fees, and other training-related expenses paid to the training institution and are the mechanism by which the counselor/case manager requests an ITA on behalf of the customer. The ITA is subsequently awarded by SCOWB and the Service Provider will release a Purchase Order to obligate the WIOA funds.
- b. Funds will be disbursed for tuition, books, fees and other training-related expenses upon receipt of properly completed invoice from the training institution.
- c. WIOA Title I ITA expenditures are documented and tracked by the Service Provider to ensure that obligations do not exceed approved SCOWB budget line items.
- d. WIOA Title I expenditures for training, training-related, and supportive service costs are tracked by the WIOA service provider to ensure that the unmet financial need on the COTF form is not exceeded in any given period of training.
- e. Payments for tuition, books, fees and other training-related costs will only be disbursed to the training institution one semester or term at a time, or for a six-month period for those institutions that do not operate on a semester or term basis.
- f. The documentation required to support the payment mechanism of ITAs will include the Individual Training Voucher form, the ITA form, the purchase order, the invoice and supporting documentation.

ITA LIMITS

SCOWB ITA limits: Funding--\$15,000.00 (Other sources of funding that may be awarded to a WIOA customer such as PELL Grants, scholarships, or other one-stop employment and training funding assistance may limit the maximum amount of an ITA.) Time Length--An ITA will be issued for a maximum of 24 months or for the actual length of the training program, whichever is less.

- a. Customers will normally be issued one ITA. In special circumstances, at any time during the duration of the ITA, SCOWB or its staff may extend an ITA for up to an additional 24 months and/or increase the amount of funding to double that listed above. The determination to extend and/or increase a customer's ITA will be based on the customer's needs as identified in the IEP.

FORMS

Service Provider is required to use the attached forms. Changes to local forms should be requested in writing.

ATTACHMENTS:

Attachment A: Individual Training Account Agreement Form

Attachment B: Individual Training Voucher Form

Attachment C: Coordination of Training Funds

Attachment D: ITA Modification

ACTION REQUIRED: WIOA Service Providers and Fiscal Agent must understand and comply with this policy.

APPROVED: Executive Committee 5/11/2022

Individual Training Account (ITA) Agreement

Participant Name:	_____	Participant ID:	_____
Training Provider:	_____	ITA Start Date:	_____
Training Program:	_____	ITA End Date:	_____
Demand Occupation:	_____	ITA Amount:	_____

ACKNOWLEDGEMENT AND AGREEMENT

_____ The amount of my Individual Training Account (ITA) has been awarded based on individual factors including cost of attendance, coordination of other funding sources, and needs identified in my Individual Employment Plan (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. Any modification to the ITA Agreement must be approved per Workforce Development Board policy and only for exceptional circumstances.

_____ It is my responsibility to budget and track my ITA expenditures to ensure that the funds available to me are not depleted prior to completion of training. I will coordinate with my Career 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 it is required that I maintain a 2.0 grade point average (GPA).

_____ 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 Career 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 Career Manager to discuss my training progress and any other issues, whether academic, personal, or financial, which may affect the successful completion of my training.

_____ I will immediately inform my Career Manager of changes of name, address, phone number, email address or back-up contact information.

_____ Prior to the beginning of each new semester, I will schedule an appointment with my Career 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 Career Manager immediately.

_____ ITA funding may be used to pay only for classes or training directly related to my training/degree plan. ITA funding will not be used to pay for the same class more than once. If I fail a class, I will be responsible for paying for such class the second time.

_____ Upon completion of my training, I agree to provide my Career 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**

_____ **WIOA Service Provider's Signature** _____ **Date**

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ITA # _____

Individual Training Voucher Form

Training Institution/Provider: _____

Mod #: _____

Participant Name: _____

ID #: _____

WIOA Program/Funding Stream: TAA Adult DW Other: _____

(WIOA Service Provider) 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-compliance will be made to _____ (WIOA Service Provider) .

Explanation if this is a Modification:

TRAINING

Course #	Course Title	Hours

AUTHORIZED TRAINING COSTS

Items	Amount	Items	Amount
Tuition	\$	Uniforms	\$
Fees	\$	Tools:	\$
Supplies	\$	Books:	\$
Books	\$	Other:	\$
			TOTAL \$

As the recipient of Workforce Innovation & Opportunity Act (WIOA) Program assistance with tuition, books, fees, or other required supplies, I hereby authorize the training institution listed above to release information regarding my attendance, grades, schedules, personal conduct and/or other information as needed to the _____ (WIOA Service Provider) .

Participant Signature

WIOA Service Provider Signature

Date

Date

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COORDINATION OF TRAINING FUNDS

SECTION I

To: Financial Aid Office

Attention: _____

From: _____

School: _____

Attention: _____

Fax or E-mail Address: _____

Fax or E-Mail Address: _____

Participant Name: _____

ID Number: _____

I hereby authorize the exchange of information between the WIOA 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 II: The following section is to be completed by the financial aid office.

PERIODS COVERED

Start Date: _____

End Date _____

- Fall _____
- Spring _____
- Summer _____

- Trimester I
- Trimester II
- Trimester III

- Full Length of Short Course

COST OF ATTENDANCE *

Tuition and Fees \$ _____

Books, Supplies and Tools \$ _____

Uniforms \$ _____

OTHER EXPENSES RELATED TO TRAINING **

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

TOTAL COST OF ATTENDANCE \$ _____

STUDENT'S FINANCIAL AID

PELL Grant Eligibility \$ _____

_____ Student or Program is not PELL eligible

OTHER FINANCIAL RESOURCES EXCLUDING LOANS AND VA BENEFITS

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

_____ \$ _____

TOTAL FINANCIAL AID \$ _____

Total 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 WIOA 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

**As defined by the Higher Education Act Section. 472*

***Other expenses related to training may include transportation, room and board, vehicle insurance, and other items necessary for attendance as defined by local policy.*

SECTION III: The following section is to be completed by the WIOA Case Manager.

After a comprehensive review of services provided by partner agencies, other social service agencies, and other community resources, I have determined that WIOA funds are necessary for attainment of the participant's employment goal. I certify that WIOA funds will be coordinated with other funds and there will be no duplication of resources.

WIOA Service Provider's Signature

Date

ITA Modification

Participant Name:			
Participant ID:			
ITA Start Date:		ITA End Date:	
Modified Start Date:		Modified End Date:	
ITA Original Amount:		Modified Amount:	
Demand Occupation:		Funding Stream:	
Training Provider:			
Training Program:			

Items To Be Modified:	
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Reason for Modification:	
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I CERTIFY THIS REQUEST FOR ITA MODIFICATION.

Talent Development Specialist Signature

Date:

Approval of ITA Modification

Supervisor Signature

Date: