



David A. Paterson, Governor

M. Patricia Smith, Commissioner

## NEW YORK STATE WORKFORCE DEVELOPMENT SYSTEM TECHNICAL ADVISORY

### Workforce Development System Technical Advisory #09-2

**TO:** Workforce Development Community

**DATE:** March 9, 2009

**SUBJECT:** Individual Training Account (ITA) Approval Policy

#### ***Purpose***

To establish state policy on four elements of the Individual Training Account (ITA) mechanism for funding training.

1. ITA Justification.
2. ITA Approval Authority.
3. LWIB Responsibilities.
4. State priorities.

This policy is intended to expedite and streamline the delivery of training services through the Workforce Investment One Stop system by ensuring that:

- ♦ An eligible individual whose comprehensive assessment identifies a skills gap and identifies a training program to remediate the skills gap is quickly approved for an ITA – to the extent other mechanisms for providing the training are not available;
- ♦ Staff who have responsibility for providing comprehensive assessment services also have the authority to develop and submit an ITA for funding approval; and
- ♦ State level policy on funding training services through ITAs is transparent to entities wishing to leverage funding with the Workforce New York One-stop System.

With the federal government's increased investment in workforce development, there is a clear expectation that the One-Stop system will increase the number of individuals who receive training services. New York State is implementing this ITA policy to optimize the One-Stop system's training approval process, ensure seamless service for One-Stop center customers, and enhance the One-Stop system's capacity to target resources for training in priority demand occupations.

#### ***Background***

A comprehensive assessment must be conducted for all customers whose initial assessment identifies a need for Career Development Services. Per WDS TA #08-4, *Effective Use of*

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*Assessment in the Workforce Investment One-Stop System* (June 12, 2008), a comprehensive assessment identifies an individual's:

- ♦ “Barriers to Employment” (beyond skills development) which impede the customer's ability to search for, accept, and/or retain employment.
- ♦ “Employment / Occupation Goal” relevant to the local/regional labor market.
- ♦ “Proficiency in the Occupational Knowledge, Skills and Abilities” associated with the Employment Goal.

Comprehensive assessment requires consideration (assessment) of all factors that comprise an individual's employment plan, including: career planning; having proper prerequisites; suitability for training, willingness to be trained, barriers to successful participation in training, core and intensive services that address skills gaps; demand / priority occupations in the region, availability of resources (WIA and non-WIA); the availability and leveraging of services of local partnerships with Community Based Organizations; and peer reviews.

Criteria for regional Individual Training Account (ITA) policies are outlined in Workforce Development System Technical Advisory (WDS TA) #08-7, *New York State Program Year (PY) 2008 Incentive and Sanction Policy for Local Workforce Investment Area (LWIA) Performance for the Workforce Investment Area (LWIA) Performance for the Workforce Investment Act (WIA) Title 1B Program and the Wagner-Peyser Act (W-P) Program* (October 24, 2008), Attachment 3. Any regional strategies currently being devised should be considered in the development of local ITA policy and procedures.

## **Action**

Effective immediately.

1. ITA Justification – Identification of a training program to remediate a skills gap identified through comprehensive assessment is sufficient justification for issuance of an ITA for the training program.
  2. ITA Approval Authority – The staff person conducting the comprehensive assessment and identifying the training program with the customer is authorized to develop and submit an ITA for the training program for funding approval. The funding approval authority is contingent upon the availability of training funds in the local area.
  3. LWIB Responsibilities
    - a. Training Funding – The LWIB must identify the budgeted amount of training funds available in the local area for ITAs, on-the-job-training (OJT) and customized training. It is recognized that the budget may be revised during the course of the program year to address training needs of the local area.

The local area will report the training budget and expenditures through current fiscal monthly reporting to the Department. The monthly fiscal report will be modified to accommodate this reporting, commencing with the March 2009 report, due April 20, 2009.
    - b. Assurances – The LWIB must have written local ITA policy and procedures which are consistent with this WDS-TA. The policy and procedures must also address the
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following items:

- i. ITA cap amount;
- ii. ITA time frame;
- iii. Priority of service;
- iv. Self-sufficiency standards;
- v. Demand occupations/skills in the local area;
- vi. Training programs that address the skills needed for the demand occupations;  
and
- vii. The availability of funding for ITAs.

In addition, the LWIB must distribute these to all One-Stop staff who provide Career Development Services to assure consistent delivery of service in the local area. The policy and procedures must be in place and distributed by April 20, 2009.

4. State Priorities – The ITA mechanism and local one-stop system are an effective infrastructure for delivering training services, and are important to supporting the implementation of state training priorities. Therefore, the Department reserves the right to identify demand occupations and associated training programs deemed a priority by the state that should be implemented through the local ITA mechanism in collaboration with LWIBs.
5. Supplemental Funding – The Department reserves the right to base supplemental funding decisions on a local area’s ability to expend funding for training through ITA, OJT, customized training and classroom opportunities. The Department also reserves the right to withhold future supplemental funds from a local area that does not fulfill the requirements of this ITA policy. The Department also reserves the right to prioritize demand occupations and associated training programs for use of supplemental funding.

### ***Inquiries***

Please direct all questions regarding this Technical Advisory to: Valerie Sewell at [Valerie.Sewell@labor.state.ny.us](mailto:Valerie.Sewell@labor.state.ny.us).

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