



Arkansas Workforce Center at Little Rock

LRWDB Program Directive

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Directive Number	SUBJECT
POL 2025 Occupational Training ITA	Occupational Skills Training/ITA Policy
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PURPOSE

The purpose of this policy is to describe and detail the regulations concerning occupational skills training in accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA), the WIOA Final Rule, Training and Employment Guidance Letters (TEGLs) published by the Employment and Training Administration of the U.S. Department of Labor (ETA), and Arkansas Workforce Development Board policies.

Definition of Occupational Skills Training

Occupational skills training is one of the training services available to Adults, Dislocated Workers and Youth [WIOA §§ 134(c)(3)(D)(i) & 129(c)(2)(D); 20 CFR 680.200 & 681.540; TEGL 21-16]. The training is an organized program of study that provides specific vocational skills that lead to proficiency in performing tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels [20 CFR 681.540; 20 CFR 679.560(b)(18)].

Definition of Individual Training Account (ITA)

An ITA is an agreement established by a WIOA title I service provider with a training provider to pay certain required costs on behalf of a participant. It may be written for any allowable type of program of study that is on the state eligible training provider list (ETPL) and has been approved by the workforce development board (LRWDB). Any payments to be made directly to the training provider must be listed on the ITA, whether the payments are for direct training costs or supportive services (such as books, supplies, and fees).

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, such as through payments of a portion of the cost at different points in the program of study [20 CFR 680.300].

Adults and Dislocated Workers

Eligibility

WIOA funding for training is limited to participants who: 1) Are unable to obtain grant assistance from other sources to pay the costs of their training; or 2) Require assistance beyond that available under grant assistance from other sources to pay the costs of such training. [20 CFR § 680.230]

To receive Occupational Skills Training an Adult or Dislocated Worker must meet all of the following numbered eligibility criteria:

1. Meets all eligibility requirements for the Adult or Dislocated Worker program in accordance with the LRWDB priority system in effect for services provided through the Adult formula funding stream [ADWS Policy No. WIOA I-B – 1.2; ADWS Policy No. WIOA I-B – 3.1; TEGL 19-16]

2. Has been determined after an interview, evaluation, or assessment, and after career planning that the individual meets all of the following criteria [WIOA § 134(c)(3)(A)(i)(I); 20 CFR 680.210(a) & 680.220(a); TEGL 19-16]:
 - a. Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency, as determined by the LRWDB, or wages comparable to or higher than wages from previous employment through career services alone
 - b. Is in need of training services to obtain or retain employment leading to economic self-sufficiency, as determined by the LRWDB, or to wages comparable to or higher than wages from previous employment
 - c. Has the skills and qualifications to participate successfully in training services

Where appropriate, a recent interview, evaluation, or assessment may be used for assessment purposes [WIOA § 134(c)(2)(B); 20 CFR 680.220(a); TEGL 19-16; Comments in WIOA Final Rule concerning 20 CFR 680.150].

The case file must contain a determination of need for occupational training services as determined through the interview, evaluation, or assessment, and career planning or any other method through which the one-stop center or partner can obtain enough information to make an eligibility determination. There is no requirement that career service be provided as a condition to receive occupational skills training. If recommended services are not provided before occupational training, however, case files must document the circumstances that justified the determination to provide training without any of the recommended career services [20 CFR 680.220)].

3. Selects a program of training services that is directly linked to the employment opportunities in the Little Rock area or greater planning region, or in geographic areas to which the individuals are willing to commute or relocate. The LRWDB refers, reviews and approves occupational skills training providers and programs for addition to the Eligible Training Provider List (ETPL) to meet this requirement [WIOA § 134(c)(3)(A)(i)(II); 20 CFR 680.210(b); TEGL 19-16].

The selection of training services shall be conducted in a manner that maximizes customer choice [20 CFR 680.340(a)], is linked to in-demand employment opportunities in the Little Rock area or greater planning region or in a geographic area in which the adult or dislocated worker is willing to commute or relocate, and is coordinated to the extent possible with other sources of assistance [TEGL 19-16]. To fulfill this requirement, the LRWDB makes available to customers the list of eligible training providers, a description of the programs through which providers may offer training services, and the performance and cost information about those providers [20 CFR 680.340(b)].

The LRWDB also works with representatives of secondary and postsecondary education programs to lead in the development and implementation of career path ways by aligning local employment, training, education, and supportive services needed by adults and youth, particularly individuals with barriers to employment [WIOA §§ 3(24); A.C.A. 15-4-3711(a)(8)].

4. Is unable to obtain grant assistance from other sources to pay training costs, including such sources as State-funded training funds, Federal Pell Grants, and TANF; or requires WIOA assistance in addition to these other sources.

In making the determination, the LRWDB takes into account the full cost of participating in training services, including the cost of support services and other appropriate costs [WIOA § 134(c)(3)(B)(i)(I); 20 CFR 680.210(c); 20 CFR 680.230; TEGL 19-16].

The LRWDB coordinates training funds available and make funding arrangements with its one-stop partner and other entities to apply WIOA provisions for occupational skills training. This includes considering the availability of other sources of grants to pay for training costs such as Temporary Assistance for Needy Families (TANF), State-funded training funds, and Federal Pell Grants, so that WIOA funds supplement other sources of training grants. [20 CFR 680.230]

The availability of funding from other programs, grants, and scholarships shall be sought, so that WIOA funds supplement other sources [20 CFR 680.230(b)]. VA benefits for education and training services are not be included in “other grant assistance” in determining the amount of funding WIOA can provide. Veterans and eligible spouses are not required to coordinate their entitlement to VA benefits for education and training with any concurrent eligibility that they may have for other training sources. Veterans or spouses are not required to exhaust their entitlement to VA funded training benefits prior to receiving WIOA funds for training [TEGL 10-09].

In order to determine if a participant is able to obtain grant assistance from other sources, the participant must either apply for a Federal Pell Grant or must submit documentation that he or she is unable to obtain the grant, using ADWS FORM WIOA I-B – 3.3 (Verification of Educational Grant Assistance) or other official documentation from the Financial Aid Office of a college or the Federal Student Aid office of the U.S. Department of Education.

Such documentation can also document the amount of assistance expected to be given, which can be used in determining the participant’s unmet need. To determine a participant’s unmet need, the LRWDB deducts the amount of scholarships and grants from the cost of attendance.

A WIOA participant may enroll in WIOA-funded training while his or her application for a Pell Grant is pending as long as the Workforce Center has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider

charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the participant for education-related expenses [20 CFR 680.230].

If the applicant is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination, training may be provided under WIOA if all other eligibility requirements are met. If the petition is certified, the worker will then transition to TAA approved training. If the petition is denied, the worker continues training under WIOA [TEGL 19-16].

ITA Agreements

The ITA process begins with the Case Manager working one-on-one with the participant to identify career goals that align with local labor market demands and in-demand occupations. The Case Manager then assists the participant in researching approved training providers listed on the Eligible Training Provider List (ETPL). Only authorized Case Managers are permitted to issue an Individual Training Account (ITA). Once the participant submits an official acceptance letter from the training provider confirming enrollment and the program start date, the Case Manager creates the ITA and enters all required details in the Educational Grants section of AJL. This includes marking “Grant Issued,” recording the grant start and end dates, the grant amount, and the targeted occupation. The Case Manager must also obtain all necessary signatures on the ITA before the participant can begin training. Once completed, the invoice and ITA are submitted to the Project Director for review and then forwarded to the appropriate entity for payment processing.

ITA agreements, which outline the agreed upon program of study, are signed by the participant, case manager and training provider. The case manager is responsible for coordinating between other funding sources, including Pell grants, private scholarships, or other sources of federal or state support to arrive at the proper determination of funds required from WIOA for the ITA. A copy of the ITA agreement is provided to the participant and the training provider, and a copy is kept in the participant file.

ITAs vs Contracts for Service

Occupational Skills Training is typically provided through Individual Training Accounts (ITAs). Except under the conditions listed below, training services must be provided by an approved eligible training provider (ETP) through an individual training account (ITA) [WIOA §134(c)(3)(G(i)); TEGL 19-16].

Contracts for services are used instead of ITAs only when one or more of the following exceptions apply and the consumer choice requirement described above has been fulfilled [WIOA § 122(h); WIOA § 134(c)(G)(ii); 20 CFR 680.320(a); TEGL 19-16]:

1. When the LRWDB determines that there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of

ITAs. The determination process must include a public comment period for interested providers of at least 30 days.

2. When the LRWDB determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment [WIOA §3(24); 20 CFR 680.320(b)]:

The LRWDB uses the following criteria to determine demonstrated effectiveness of training services programs to serve individuals with barriers to employment [20 CFR 680.320(a)(3); TEGL 19-16]:

- a. Financial stability of the organization
 - b. Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as 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
 - c. How the specific program relates to the workforce investment needs identified in the LRWDB's local plan
3. When the LRWDB determines that
 - a. It would be most appropriate to contract with an institution of higher education as defined in [20 U.S.C. 1001, 1002(a)(1))] or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations and
 - b. such contract does not limit customer choice
 4. When the LRWDB determines that a pay-for-performance contract is suitable consistent with 20 CFR 683.500. If the LRWDB enters into a pay-for-performance contract, the contract shall be consistent with 20 CFR 683.510. No more than 10% of local funds may be spent on pay-for performance contract strategies, as defined in WIOA § 3(47).

The LRWDB may choose to combine Occupational skills training with workplace training or work experience to meet the requirements of specific situations. The LRWDB may also use ITAs with or without OJT contracts for registered apprentices [20 CFR 680.330 (a)]. Registered apprenticeship programs (RA) automatically qualify to be on a State's ETPL [20 CFR 680.330; TEGL 19-16]. Examples of RA sponsors who can be eligible training providers (ETP) includes [TEGL 19-16]:

- Employers who provide related instruction. The employer is the ETP
- Employers who use an outside educational provider, such as a postsecondary institution, technical training school, or online courses. The employer is the ETP.

- Joint apprenticeship training programs administered by a union. The union is the ETP.
- Intermediaries, such as postsecondary institutions, technical schools, industry associations, and community-based organizations, that administer the program, and either provide training or work with other entities to provide the training. The Intermediary is the ETP.

Youth

Occupational skills training is Youth Program Element 4. As a Program Element, occupational skills training must be available to all youth if their assessments of academic level, skill levels, and service needs indicate that they are prepared for such training and that the training meets their employment goals [TEGL 3-18; TEGL 8-19; TEGL 21-16].

Occupational skills training for youth must:

1. be outcome-oriented and focused on an occupational goal specified
2. be of specific duration to impart the skills needed to meet the occupational goal, and
3. lead to the attainment of a recognized postsecondary credential [20 CFR 681.540(a); TEGL 21-16].

The LRWDB awards grants or contracts on a competitive basis to eligible entities that provide occupational skills training for youth [WIOA § 3(47); WIOA §§ 122 (h)]. If the LRWDB determines there is an insufficient number of eligible providers of youth occupational skills training in the local area, grant or contracts may be awarded on a sole-source basis [WIOA §123; 20 CFR 681.540(a); TEGL 21-16].

Out of School Youth

ITAs may be used to provide occupational skills training to out-of-school youth (OSY), using youth funds to provide training with an eligible training provider (ETP) [20 CFR 681.550; TEGL 21-16]. In-school youth (ISY) cannot use ITAs using youth funds, but the LRWDB may co-enroll ISY age 18 or individual needs, older in the WIOA Adult program if the youth's knowledge, skills, and interests align with the WIOA adult program. The co-enrollment would allow the ISY to receive occupational skills training through an ITA funded by the Adult program [TEGL 21-16]; TEGL 19-16].

ITA Funding Limits

The LRWDB, in consultation with the Title I WIOA services provider, establishes limits on the provision of ITA funding, including: a maximum amount of funding, a maximum length of time for training services to be available to participants, and procedures for determining exceptions to these limits [20 CFR 680, Subpart C; 20 CFR 680.750]. The maximum amount of funding is based on the availability of local funds:

- a. The maximum amount of funding (i.e., the limit on the **total dollar amount** that may be spent through ITAs for each participant) is \$6,500 during each (12) month period of participation. The total of all individual ITAs for a participant may not exceed this amount unless the extenuating circumstances described below warrant additional consideration of funding. {20 CFR 680.310}
- b. The maximum limit on the amount of each **individual ITA** is \$6,500. The funding limit is intended to provide equitable services to all WIOA participants and to promote providing services through the use of braided funding. The Executive Director can authorize an additional amount up to \$1,000 if funds are available, circumstances require it, and the request is supported with additional documentation justifying the increase. Further increases can be considered directly by the LRWDB.
- c. Limits in the amounts or duration of ITAs are based on the type of credential (i.e., bachelor's degree, associate's degree, technical certificate, occupational license, program of study, etc. {20 CFR 680.310} The maximum duration of an ITA (i.e., the limit on time for which an individual ITA may be written) is 2 years (documented in terms of semesters/ years of college courses) or a maximum of 40 weeks for other training. {20 CFR 680.310}
- d. The same program of study with the same training provider or institution will be considered the one and same ITA, even though the time period may pause for summer/winter months or be extended over semesters or (2) years, the ITA should be written with the greatest foresight in mind, predicting the graduation/ completion date based upon the training provider's curriculum and general length of program.
- e. An individual may receive no more than one (1) ITAs unless a request is submitted with supporting documentation and approved by the LRWDB Executive Director.
- f. An individual may select training that costs more than the maximum amount available for ITAs under the local policy when other funding sources are available. (e.g., Pell Grants, scholarships).

Exceptions to ITA Limits

Limited exceptions may be made to the dollar limits of ITA funding with approval of the LRWDB. Exceptions to the Individual Training Account (ITA) requirements under WIOA are determined based on specific criteria outlined in 20 CFR 680.310(c).

Conditions under which an individual may modify or extend an ITA are addressed on a case-by-case basis: Exceptions are evaluated individually, considering the participant's circumstances and needs. Exceptions are made at the discretion of the Executive Director,

as authorized to act in accordance with the financial interests of the LRWDB, the parameters of 2 CFR, and with the Provider's approval and permission.

Common exceptions (i.e., special circumstances that warrant alternative training solutions) that may affect the timeframe for completing an ITA program may include:

- a. Serious medical conditions or short-term disabilities requiring Doctor's directive
- b. Need to care for immediate family member in health crisis supported by letter from Doctor or Social Worker
- c. When participant is required to move out of the area and the program can be completed online
- d. Lack of available training providers in the workforce development area.

Supportive Services

The LRWDB recognizes that ITAs are not the single factor that determines whether a participant successfully completes choice of an occupational skills training program. The LRWDB also provides supportive services to training participants to foster a more holistic approach to occupational skills training. Please refer to the LRWDB's Supportive Services policy for more information.

Contact Person W. J. Monagle, Executive Director	Expiration Date Indefinite
Authorized By Eddie Davis, Board Chair 	 