



## EMPLOY MILWAUKEE POLICY

**POLICY:** 17-01, CHANGE 9

**SUBJECT:** INDIVIDUAL TRAINING ACCOUNTS (ITA)

**ISSUANCE DATE:** 09/04/25

**EFFECTIVE DATE:** 01/01/26

**REVIEWED DATE:** Not applicable

### REFERENCES:

- 29 USC 3101, Workforce Innovation and Opportunity Act (WIOA), §122 and 134
- 20 CFR 680 Subparts B-D
- United States Department of Labor Training and Employment Guidance Letters (TEGLs) WIOA 21-16, WIOA 19- 16, WIOA 03-15, WIOA 21-22
- Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual Chapters 7.1 Individual Training Accounts, Chapter 8.3.4: Economic Self-Sufficiency, 8.5.1 Eligibility for Training Services

### POLICY SCOPE

- ☒ EMPLOY MILWAUKEE AGENCY
- ☐ WIOA WDA 2 SYSTEM
- ☒ WIOA TITLE I-B PROGRAM(S)
  - ☒ ADULT PROGRAM
  - ☒ DISLOCATED WORKER PROGRAM
  - ☒ YOUTH PROGRAM
- ☐ NON-WIOA PROGRAMS
- ☐ RE ENTRY PROGRAMS

## I. BACKGROUND

The Wisconsin Department of Workforce Development – Division of Employment and Training (DWD-DET) defines "Occupational Classroom Training" as an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields. Occupational classroom training is funded by Individual Training Accounts (ITAs).<sup>3</sup> Whenever an ITA is used, Wisconsin's Eligible Training Programs List (ETPL) must be used to select the training program.<sup>4</sup>

An Individual Training Account (ITA) is a payment arrangement the local Workforce Development Board (WDB) or its service provider makes, on behalf of a participant, with a training institution for training services,<sup>1</sup> when the program of choice is included on the state's Eligible Training Programs List (ETPL).<sup>2</sup> The payment to the training institution may be made in full or incrementally.<sup>3</sup> Issuing the payment(s) may be performed in a variety of ways, including electronic transfer of funds through financial institutions (e.g., ACH payments) and/or paper checks.<sup>4</sup>

Local WDBs must fund a participant's training program of choice through an ITA when:

1. the participant is found eligible for training;
  2. the participant selects a training program from the ETPL in consultation with their career planner;<sup>7</sup>
  3. the training program is fundable considering local ITA limitations;<sup>8</sup>
  4. consistent with federal cost principles, the local WDB determines that the cost of the program is considered reasonable;<sup>10</sup>
- AND
5. the local WDB has not exhausted training funds for the program year.<sup>9</sup>

If the five conditions outlined above are not met for a given participant, an ITA cannot be used to fund the participant's training program, and the local WDB must ensure the reason(s) for denying the ITA are documented. When the denial is based on the unreasonableness of the cost of the program, the local WDB's documentation must

## EMPLOY MILWAUKEE POLICY 17-01, CHANGE 9

demonstrate that other comparable training options were available at a lower cost.

Participants of the WIOA In-School Youth Program may use ITA funding for such training services only when a state waiver is in place, or participants are co-enrolled in the WIOA Adult Program and only when funded through that WIOA Adult Program.

### II. PURPOSE

This policy describes the process through which the WDB meets federal requirements related to the use of ITAs for training services. This policy also establishes local procedures to ensure consumer choice and limitations for ITAs in Wisconsin Workforce Development Area (WDA) #2.

### III. POLICY

#### A. Consumer Choice

WIOA requires that the local WDB ensures informed consumer choice in the selection of training programs through the WDA's American Job Centers (AJCs). The area's One-Stop Operator ensures that the state's ETPL is available in all area AJCs. WIOA participants must select, in consultation with a Career Planner, an Eligible Training Provider (ETP) from the Wisconsin ETPL. Such consultation must include a discussion of program quality and performance information on the available ETPs. WIOA requires that priority consideration be given to programs that lead to recognized postsecondary credentials aligned with in-demand industry sectors or occupations in the local WDA.

#### B. Funding

20 CFR § 680.230 outlines the requirements for coordination of WIOA training funds and other grant assistance.

#### C. Required Predecessors

An individual must complete the comprehensive or objective assessment requirements and have an Individualized Employment Plan (IEP) or Individualized Service Strategy (ISS) developed with their WIOA Career Planner. The Career Planner must document a determination of need for training services as determined through the assessment and career planning informed by local Labor Market Information (LMI) and training provider performance information. The training services must align with the assessment results and be included in the IEP or ISS.

A WIOA Adult or Dislocated Worker Program participant may only receive WIOA Title I-B-funded training if s/he meets requirements of 20 CFR §680.210, which includes that “the individual is not considered economically self-sufficient and needs training to obtain economic self-sufficiency or the individual is considered economically self-sufficient but is unlikely to remain so without training” as stated in the Wisconsin WIOA Title I-A and I-B Policy and Procedures Manual. A WIOA Career Planner must use the Economic Self-Sufficiency Calculator in CEPT (Comprehensive Employment Planning Toolkit) to justify placing the participant into training.

#### D. Training Standards and Requirements

ITAs may only cover training programs for an in-demand occupation or sector, as substantiated by LMI from the State of Wisconsin Department of Workforce Development Office of Economic Advisors (OEA) and labor market exchange (Job Center of Wisconsin - Wisconsin). ITA approvals will align with the industry share of jobs in each respective sector.

ITAs for completion of a Baccalaureate (Bachelor's) Degree will be considered only when the participant can provide documentation from the training provider that the degree can be completed in four semesters or less. ITAs may not be used to pay for costs associated with Post-Graduate Degrees.

Participants must maintain a 2.0 grade point average in the prior semester to receive WIOA funding to pay for any additional semesters.

## EMPLOY MILWAUKEE POLICY 17-01, CHANGE 9

Employ Milwaukee (EMI) staff reserves the right to research specific occupations and current labor market demand to ensure that the requested training will support an individual's ability to obtain unsubsidized employment at a living wage.

Local Workforce Development Boards (WDBs) budget to spend 35% of their annual formula program funding allotment for each of the Adult, Dislocated Worker, and Youth programs on direct-to-participant costs including tuition and other training costs. EMI reserves the right to only approve trainings that include WIOA credentials and/or Wisconsin Technical College System (WTCS) and Universities of Wisconsin (UW) programs that include college credits when it has met or surpassed its 35% spending goal for tuition and other training costs. When waitlists for training are necessary, EMI will follow WIOA policies pursuant to use of waitlists (WIOA Policy and Procedure Manual Ch. 3.6.1).

### E. Limitations

#### 1. Funding Limitations.

WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the training costs or who require assistance beyond that available under grant assistance from other sources to pay training costs. Therefore, EMI may only pay training costs that are not covered by another funding source.

WIOA funds will not be used to re-take failed courses if WIOA funds were used to cover the expenses of the failed course.

#### 2. Duration Limitations.

Training providers must ensure that the Duration/Total Credit Hours field on the ETPL is complete and accurate. This information is necessary to correctly calculate 20% of program completion.

One individual training voucher may not exceed 6 months of training. Multiple vouchers for the same course of study may not exceed 4 consecutive semesters. Individuals receiving a training voucher may not receive another for a different course of study until 48 months after the first training program has been completed.

#### 3. Dollar Limitations.

WIOA participants in WDA 2 may not receive training services that exceed \$6,000 in costs. The WDA 2 training cap is based on a seven-year look back period. The voucher shall document training costs covered by the ITA (tuition) and by Supportive Services (books, fees and other educational materials and supplies).

ITA training voucher amount limits will be approved based on the length of the training. The "Training Tiers" will be based on the hours listed on the ETPL for the specified training. The length of training (direct instruction hours), curriculum description must be listed on the ETPL, and performance outcomes must be independently verified for training to be considered.

Tier Level	Length of Training (Hours)	Amount of Training Voucher to be Approved
Tier 1	Less than 40 hours	\$700.00
Tier 2	41 – 99 hours	\$2,500.00
Tier 3	100 – 160 hours	\$5,000.00
Tier 4	More than 160 hours	\$6,000.00

#### 4. Geographic Limitations.

No more than 5% of total annual program year WIOA Adult, WIOA Dislocated Worker, and/or WIOA Youth training funds may be used to serve participants living outside of WDA 2 without approval from the CEO.

## IV. PROCEDURES

### A. Payment Method

Because 20 CFR §680.300 states that "the ITA is a payment agreement established on behalf of a participant with a training provider," payment of ITA costs are made directly to the training provider providing the services. Direct reimbursements to participants for training dollars are not allowed.

Employ Milwaukee reimburses 100% of ITA costs at time of voucher approval for the following training providers: Wisconsin Technical Colleges, Universities of Wisconsin, and Wisconsin Association of Independent Colleges and Universities Institutions, 4Cs of Greater Milwaukee and others as approved by EMI.

ITA payments to all other training providers are based on the following benchmarks: 50% of the voucher value at program enrollment and 50% when the student has completed training.

EMI defines program enrollment as attending at least 20% of the total credit hours listed on the ETPL, not including orientation or self-study hours. A training invoice must be accompanied by an enrollment list that includes signed attendance sheets from the WIOA participant documenting participation in at least 20% of classroom hours. Once verified, a unit rate of 50% of the ITA cost will be paid. The 50% program enrollment invoice must be submitted within six months of the training end date to receive payment.

EMI defines training completion as a WIOA participant completing the training program based on the voucher's anticipated training end date as demonstrated by a valid program completion certificate. A program completion invoice must be submitted within six months of the training completion to receive payment for the remaining 50%.

Training providers are prohibited from holding the participant liable for costs covered by WIOA funds but not paid by EMI when the benchmark required to receive the final 50% payment is not met. Training related supportive services will be paid 100% after 20% of the credit hours are attended are documented.

### B. Career Planner Activities

WIOA Career Planners must review and discuss training provider options with a WIOA participant who is seeking training services. A case note must be made in ASSET stating the date on which the ETPL was reviewed with the participant to substantiate informed consumer choice.

A WIOA participant must complete a Free Application for Federal Student Aid (FAFSA) to see if a Federal Pell Grant may be available to assist with funding the training. A copy of the proof of FAFSA application submission document is placed in a participant file with a case note that specifies the financial aid status. For training programs on the ETPL that indicate Financial Aid is not available, participants do not need to complete a FAFSA. In such instances, the Career Planner must indicate in an ASSET case note that Financial Aid is unavailable for the training program.

A WIOA participant may enroll in WIOA-funded training while his/her application for a Pell Grant. Participants are obligated to communicate an award of a Pell Grant as determined by the FAFSA application to their Career Planner within 30 days of the decision. Career Planners will forward the decision to the EMI Program Specialist. In that case, the training provider must reimburse the program 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 WIOA participant for education-related expenses, which includes supportive services, per 29 CFR §680.23(c). A copy of the completed FAFSA must be placed in the participant file.

## EMPLOY MILWAUKEE POLICY 17-01, CHANGE 9

When a WIOA participant has selected a provider, the Career Planner must submit a packet containing the voucher and supporting documentation to the EMI Program Specialist and/or their Manager.

A packet that includes a request for an exception to any requirements or EMI limitations in this policy must include a justification statement and be provided to the EMI Program Specialist or Manager for preliminary approval. The EMI Program Specialist or Manager will consider the reasonableness of the request and will submit the request to the EMI CEO if it has been preliminarily approved. Once EMI's CEO has granted an exception and provided signatory approval, the voucher may be completed and processed as usual.

### C. Post-Enrollment Activities

After a WIOA participant has enrolled in a training program for which student financial aid is available, the training provider's financial aid officer or participant must inform the Career Planner of the amounts and dispositions of any financial assistance awarded to the individual for that training program. The training provider may not apply any Pell funds received for the participant to the participant's supportive services costs.

The Career Planner must update the training service in the participant's ASSET record in Services with the actual open and closed dates, the completion code, the ITA Program Outcome, and the ITA Employment Outcome. Any credential received from the training services must be properly documented in the file and added to the participant's ASSET record in Follow-ups. Any measurable skill gain achieved through the training services must be properly documented in the file and added to the participant's ASSET record in Assessments.

## V. Exceptions

Any exceptions, including exceptions to the limitations outlined in this policy, will be considered case-by-case and must be forwarded to the CEO for approval.

### 1. Exception for Failed Courses.

Any exception to fund re-taking a failed course previously paid using WIOA funds must be approved by the CEO.

### 2. Exception for In-Demand Occupation Requirement.

An exception to EMI's requirement that a training program be for an in-demand occupation or sector will be considered when provided with a justification statement accompanying the voucher packet. EMI's CEO reserves the right to decline approval of ITAs that are not aligned with these industry sectors, decline approval of ITAs in these 7 sectors if their proportion is greater than the current market share of jobs, and/or approve ITAs not in these 7 sectors if there is a special project, proven employment not reflected in available labor market information, or extenuating circumstances.

### 3. Exception for Duration Limitations.

An exception to EMI's duration limitation per individual will be considered when provided with a justification statement accompanying the voucher packet. Exceptions may be granted for study courses exceeding four consecutive semesters or duration exceeds voucher limit of six months for a non-semester-based training course.

### 4. Exception for Dollar Limitations.

An exception to EMI's \$6,000 training cap per individual will be considered by the CEO when provided with a justification statement accompanying the voucher packet. In such cases where an exception to the \$6,000 maximum is approved, a participant's training costs may not exceed \$7,500 in total. Exceptions may be granted for a reasonable expectation of employment following training completion, high-demand occupation with higher training costs, lack of comparable lower-cost alternatives, unavailability of training from another vendor within a reasonable distance or within two months, participation in a stackable credential pathway, or designated special initiatives.

## EMPLOY MILWAUKEE POLICY 17-01, CHANGE 9

### 5. Payment Method.

Training providers with a verified completion rate of 80% or higher as determined through EMI's funder-mandated system reports and/or internal participant data tracking systems shall be eligible to receive a final 40% reimbursement for non-completers. For non-completers, invoicing must include a signed attendance sheet that documents all dates and times the participant was present. This includes any remaining attendance dates not previously reported in the first invoice of the program.

### 6. Establishing Reasonableness of Cost and Length.

To support an exception request, establish reasonableness of cost and length of training:

- The participant must compare 3 similar training vendors who provide the same training being requested.
- A reasonable cost and length of training would be training providers with a training cost and/or a training length within 10% of one another.
- EMI staff reserves the right to research industry standards to ensure length of training, competencies, and cost are reasonable and support an individual's ability to obtain unsubsidized employment at a living wage.

#### Examples:

Example A - LENGTH OF TRAINING: Certified Nursing Assistant (CNA) is required to complete 75 hours of classroom and 16 hours of clinical experience in order to be placed on the Wisconsin State Registry. Therefore, a training provider with a CNA class exceeding 100 hours could be identified as unreasonable.

Example B - COST: Community-Based Residential Facility (CBRF) training is offered by 2 providers at \$925 and \$937. A third vendor is charging \$10,000 for the same training. The third provider will be identified as unreasonable.

A request for an exception to an EMI training cap must be made as outlined in the Procedures section above.

## VI. ACTION REQUIRED

- WIOA Title I-B Service Providers in WDA 2 must share this policy with Career Planners and other WIOA staff immediately.
- All voucher requests for ITA costs submitted following this policy's effective date must meet the local requirements and follow prescribed procedures described herein.
- Posting of this Policy to the EMI website for open access to all personnel.

---

**REVISIONS:** Policy 17-01, Change 8

**BOARD APPROVAL DATE:** 09/04/25

A proud partner of the  American Job Center<sup>®</sup> network

Employ Milwaukee is an Equal Opportunity Employer and Service Provider. If you need this information or printed material in an alternate format, or in different language at no cost to you, please contact us at (414)-270-1700. Deaf or hard of hearing or speech impaired callers can contact us through Wisconsin Relay Service at 7-1-1.