



Attachment A

**PERSONAL TRAINING ACCOUNT POLICY
(Including Individual Training Accounts, Supportive Services, Needs Based Payments, Self-employment Training, and Work Based Learning)**

Policy: <insert here>

Effective Date: May 1, 2017

A. BACKGROUND

In order to achieve their employment goals and move toward self-sufficiency, many job seekers, including incumbent workers, accessing the WorkSource Snohomish system require services with specific costs that will be funded with WIOA Title I and other resources. Personal Training Accounts (PTAs) are a consistent structure for the provision of such services.

B. POLICY

Subrecipients will use Personal Training Accounts (PTAs) to provide Workforce Snohomish funded training and employment activities to eligible job seekers, including youth and incumbent workers, unless otherwise specified below.

In order to receive funding for services via a PTA, job seekers must be **fully enrolled and have a Service Plan** in place documenting the need for such services. PTAs are not an entitlement. **Because WIOA Title I funds may not be used to supplant resources available from other funding sources, subrecipients must determine and document** that other resources are not available to meet job seeker needs before using WIOA Title I resources. Subrecipients are encouraged to work with partners to expand the funding available to meet job seeker needs. WIOA Title I funds may only be provided at the levels established in each of the procedures referenced in this policy. Priority of services requirements described in Workforce Snohomish's eligibility policy apply to PTAs.

Sub-recipients will avoid organizational and personal conflicts of interest as per the Workforce Snohomish Conflict of Interest Policy in the development and monitoring of PTAs and the services provide via PTAs.

Subrecipients issuing PTAs must provide job seekers with the information needed to make informed choices about their employment future and the services needed to support that future (e.g. skills assessment, labor market conditions and trends, training vendor performance). Sub-recipients issuing PTAs must determine that the expenses funded via the PTA **are reasonable, allowable and necessary** to the job seeker's completion of services defined in the service plan in order to reach employment goals on a path to self-sufficiency.

Resources for the following services may only be provided using PTAs;

- **Occupational Skills Training:** When sub-recipients determine that an enrolled job seeker requires Workforce Snohomish funded classroom or on-line occupational skills training, including self-employment training and training for individual incumbent workers who do not meet the criteria for incumbent worker training below, to achieve employment goals and move along a path to self-sufficiency, Individual Training Accounts (ITAs) must be developed as part of a PTA to pay a training vendor for this service. ITAs may only be used to fund training programs available on the state [Eligible Training Provider List](#), including registered apprenticeships, or training made available via an Increased Capacity Training Contract. Resources for eligible training may only be provided to job seekers who have the skills and qualifications to successfully complete the selected training and who take an active role in managing their service plan. When issuing ITAs, subrecipients must prioritize training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area, or occupations that are otherwise approved by Workforce Snohomish. An ITA may also be used to pay for the cost of pre-requisites for a training program if the job seeker otherwise has the skills and qualifications to successfully complete the training. Training is not intended to facilitate the acquisition of degrees, diplomas, or certificates strictly for the sake of education. Training is intended to move a job seeker along the path toward employment and self-sufficiency. For shorter term, less intensive trainings that are not provided via the Eligible Training Provider List, see, Short-term Training, below.

See the Workforce Snohomish Training Procedure for the requirements of issuing an ITA for training as part of a PTA.

- **Work Experience:** Workforce Snohomish requires sub-recipients and contractors to use PTAs to fund the costs of work experiences that help job seekers achieve their employment goals. Work experiences fall into two broad categories – Work Based Training and Work Based Learning, which are described below.

As per 20 CFR Section 681.590, at least 20% of non-administrative Title I Youth funds available in the area will be used to support paid and unpaid work experiences for WIOA Title I enrolled Youth. Subrecipients may include the costs of setting up and managing the work experiences as well as the cost of wages or stipends paid to youth. Youth work experiences will include academic and

occupational education, provided concurrently or sequentially with the work experience, inside or outside of the work site. Where possible, sub-recipients will coordinate work experiences with services provided by other youth serving organizations and programs.

ITAs are not required for work experiences, except as indicated below. Specific learning objectives for work experiences must be documented in the job seeker's service plan. Work experiences typically require the establishment of a contract or agreement with the business, clearly stating roles, responsibilities, and expectations. Providers of work experience are not subject to the requirements of the Eligible Training Provider List, and, with the exception of Registered Apprenticeships, are not included on the State list of eligible training providers.

[Fair Labor Standards Act \(FLSA\)](#) requirements apply to all work experiences. Job seekers engaging in work experiences must not displace other workers.

Specific procedures are provided in the Workforce Snohomish Work Experience Procedure

- **Work Based Training:** Work Based Training is a “learn and earn” strategy; the job seeker becomes employed and earns a wage during the period that they are in training. There is an expectation that the job seeker will be retained upon completion of the work based training.
 - **On the Job Training (OJT):** A “hire first” program where a business is reimbursed to provide the training necessary for a new employee to become fully skilled to perform the requirements of and be retained in the job, or move along a career path. When OJT are used to place job seekers into in-demand industries or occupations, reimbursement to the business providing the training may be increased up to 75% of the job seeker's wage during the training period. OJT may not be used to displace existing employees. Businesses providing OJT must meet all requirements for the program and may only be reimbursed up to a set amount for the training.
 - **Apprenticeship:** Apprenticeship combines on-the-job learning with job-related instruction. Apprentices are employed and earn wages during the training period. Apprenticeships include Registered Apprenticeship programs which are listed on the [Eligible Training Provider List](#) as well as non-registered apprenticeships. ITA should be used to fund any classroom training as part of registered apprenticeships. OJT may also be used or combined with an ITA to reduce the cost of training in a registered apprenticeship. ITA should not be used for non-registered apprenticeship. OJT should be used instead.
- **Work Based Learning:** Planned, structured, experiences that take place in a public, private or nonprofit workplace for a limited period of time to promote the

development of good work habits, basic work skills, and, as appropriate, an ethic of service for job seekers who have never worked, have very limited exposure to the world or work, who have been out of the labor force for an extended period of time, or who are currently unable to obtain employment due to general economic conditions. There is no expectation that a job seeker participating in a work experience will be hired at the end of the work experience, although there may be instances where this happens.

- **Internships:** An internship is a work experience designed to promote the learning of the intern rather than to meet the business's operational needs. Internships do not create the expectation of employment for the intern upon completion. Internships are an extension of the job seeker's learning and therefore learning objectives for interns must be included their service plans. Internships may be paid or unpaid. In accordance with FLSA, paid internships may provide a stipend for the intern based on some measure other than hours spent in the internship, or the intern may be paid a wage not less than the state minimum wage.
- **Transitional Jobs:** Transitional jobs are time-limited work experiences in the public, private, or nonprofit sectors that are **wage paid and subsidized** for job seekers with barriers to employment who are chronically unemployed or have an inconsistent work history. Transitional jobs are combined with comprehensive employment and Supportive Services, documented in the job seeker's service plan, and are designed to help job seekers establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment. Participants in transitional jobs shall be paid an hourly wage at the same rate as similarly situated employees or trainees, but not less than the higher of the minimum wage prescribed under the FLSA or applicable State or local minimum wage laws. Sub-recipients may not spend more than 10% of Title I Adult and/or Dislocated Worker Funds for transitional jobs. Payment for comprehensive Supportive and employment services is not included in the 10% cap.
- **Pre-apprenticeship programs:** Pre-apprenticeship programs provide instruction and/or training to increase math, literacy, and other vocational and pre-vocational skills needed to gain entry into a Registered Apprenticeship program. A pre-apprenticeship program funded with WIOA funding must have at least one Registered Apprenticeship partner and develop a strong record of enrolling their pre-apprentices into a Registered Apprenticeship program.
- **Job shadowing and work-based mentorship opportunities:** Job shadowing are time limited (from an hour-long visit with one person, to an extended week-long stay allowing interaction with numerous staff and

observation of a variety of job activities) opportunities for youth to observe employees doing their job, in order to make more informed educational and career decisions. Work-based mentorships support youth who are learning job skills while on-the-job by pairing them with more seasoned mentors to help them navigate the workplace and gain job readiness skills.

- **Supportive Services:** One-time or time limited purchases of materials, services or incentives necessary for job seekers to complete their training and employment goals, not to include the acquisition, improvement, or retention of personal assets (e.g., automobiles or homes), except as indicated below, or the payment of fines or late fees. Sub-recipients must document and access the availability of resources from partners, prior to using WIOA Title I resources for supportive services. Supportive services funded with WIOA Title I resources may be provided to those enrolled in the youth funding stream during the follow-up period after exit under specific conditions outlined in the procedures, but may not be provided to those enrolled in the adult or dislocated worker funding stream. Specific procedures related to issuing supportive services are included in the Workforce Snohomish Supportive Services Procedure. Supportive services include, but are not limited to:
 - **Short-term training:** Educational services that carry a cost, and *not* offered via the eligible training provider list, work experiences or WorkSource Snohomish Basic Career Services Workshops. These trainings, unlike occupational skills training, are generally shorter in duration and not part of a formalized degree program. Short-term training may include, but is not limited to pre-vocational services such as the development of learning skills, communication skills, including basic literacy, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for employment or training; workshops that are shorter than a typical college term to teach specific skills, such as Microsoft Excel or other software training or self-employment workshops; or on-line training modules provided by an educational or industry-recognized vendor not provided via the Eligible Training Provider List.
 - **Accommodations:** supplies, devices, software, or other supports necessary for an individual with a disability to complete training, become employed or retain employment. Accommodations must be specific to the disability of the individual. All confidential information regarding the disability should be maintained as per Workforce Snohomish's Personally Identifiable Information Policy.
 - **Child/Dependent Care Payments** to cover the cost of child/dependent care while a parent/guardian is engaged in training or employment activities. Priority will be given to single heads of household. Reimbursement will not be made if the job seeker has an unemployed spouse at home. Child/dependent care services shall be paid to a licensed vendor, unless the vendor is providing services in the job seeker's home, or there is a lack of appropriate providers in

the area. Payment shall be based upon actual, documented costs while the job seeker is participating in and traveling to or from approved activities at rates which are not greater than current Department of Social and Human Service reimbursement rates. In instances where an hourly rate is paid, the amount paid is not to exceed the maximum daily rate.

- **Transportation** including but not limited to bus tokens/passes, van pool expenses, ferry costs, or other public travel costs. Where public transportation is not available or feasible, gas vouchers may be provided for use of a private car. Repairs of an existing vehicle may be covered, only if such repairs alleviate a significant barrier to employment. Gas vouchers or repair costs may only be provided to individuals who have a current Washington State Driver's License, valid insurance, and are the registered owner of the vehicle. Car insurance may be provided as a one-time payment for a one month period when all conditions in this section apply.
- **Medical/Dental** costs not covered by other insurance policies or by state labor and industrial insurance.
- **Clothing** including uniforms required by a business, safety gear, and suitable clothing for interviewing.
- **Emergency Services** include but are not limited to payments for overdue electric, home heating fuel and water bills, not to include fines or late fees; food; rent; and/or payment for temporary shelter. Refundable deposits of any kind may not be funded with support service dollars.
- **Telecommunication** costs for voicemail, base cellular communication and internet may be covered if Community Voicemail cannot provide a feasible option, a cell phone is the only means of the individual's telecommunication, or an individual needs internet access to complete a training program, especially when the cost of internet access is less than the cost of child care enabling the participant to work on training program requirements at home. In all cases the reasons for the payment must be documented.
- **Certification, Screening and Testing** including but not limited to Union initiation fees for the first month of employment; employment-related drug screening and background checks; food handlers permits, security clearance, first aid/CPR certification, or finger printing; commercial and business licenses; skills certification such as the National Career Readiness Certificate, computer program certificates, National Association of Manufacturers or National Institute for Metalworking Skills certifications, etc.; and/or other certification fees required by law and/or not paid for by a business.
- **Out of Area Training and Job Search Expenses** including but not limited to temporary housing and other incidental expenses which are necessary and

allowable to enable individuals to participate in training or seek employment outside of their commuting area.

- **Relocation Assistance** for moving to an area outside of the local commute area for a *bona fide* job offer related to training.
- **Tools/Books/Supplies/Equipment** related to training or necessary for accepting an employment offer. A given tool or piece of equipment may only be purchased once.
- **Incentive Payments** to youth for successful participation in and achievement of expected outcomes related to training and education, work readiness skills, occupational skills attainment or other work related activity defined in their Service Plan.
- **Needs Related Payments:** Financial assistance available specifically to support a job seeker while enrolled in training. Workforce Snohomish provides does not provide Needs Related Payments. See **Support Services** for a list of services and supplies that may be used to support job seekers enrolled in training and other activities.

OTHER FUNDS

All partners are encouraged to combine resources with WIOA resources identified in a participant's PTA. All funding sources must be listed separately within the PTA and must be tracked separately. Dollar limits or caps associated with each funding source need to be set according to the restrictions associated with that source and the desire of the local partner to use the resources in this fashion.

C. DEFINITIONS:

- **Chronic unemployment** – A job seeker who wants to work and is available for work, but unable to secure employment, long term unemployed, has been unemployed for a period equal to that typical for exhaustion of Unemployment Insurance benefits, or has a work history with frequent episodes of unemployment.
- **Inconsistent Work History** – A job seeker whose work history is typified by relatively short-term attachment to past jobs.
- **Increased Capacity Training** - Competitively procured training used to pay for group training, in lieu of individual training accounts, when training is not available via the Eligible Training Provider list, training institutions do not have sufficient capacity in existing trainings, or customers are not able to enroll in training of their choice on a timely basis or are otherwise required to choose another training program. Increased capacity training must be otherwise approvable under federal and state law and policy.

- **Incumbent Worker** – An individual who is employed, meets Fair Labor Standards Act requirements for an employer-employee relationship, and has an established employment history with the business for 6 months or more.
- **In-Demand Industry Sector or Occupation:** In general, (i) an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the state, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or (ii) an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the state, regional, or local economy, as appropriate. Workforce Snohomish will determine whether an industry sector or occupation is in-demand in the region it serves.
- **Individual Training Account (ITA)** - An agreement established on behalf of a job seeker with a training provider to cover the costs of a training available from the state Eligible Training Provider List. Based on individual assessment and funds available, an ITA may be awarded to eligible adults, dislocated workers and out of school youth ages 18-24.
- **Occupational Skills Training:** 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 at entry, intermediate, or advanced levels. Typically, occupational skills training is provided by an accredited institution of higher education, a registered apprenticeship, or procured via an increased training capacity contract.
- **Service Plan** - A service plan is developed jointly by the job seeker and subrecipient/partner staff to identify employment goals, achievement objectives, barriers and mitigation strategies and an appropriate combination of services for the job seeker to achieve the employment goals. A service plan for adults and dislocated workers is known as an Individual Employment Plan (IEP) and is an individualized career service under WIOA sec. 134(c)(2)(A)(xii)(II). A service plan for youth is called an Individual Service Strategy (ISS) and must include the educational goals of the youth as well as career pathway goals.

References:

- [Washington WorkSource System Policy #5601 Revision 1: Individual Training Accounts](#)
- [Washington WorkSource System Policy #5602: Supportive Services and Needs-Related Payments](#)
- [Washington WorkSource System Policy #5606: OJT Reimbursement Above 50 Percent up to 75 percent](#)

- [Washington WorkSource System Policy #5607 Revision 2: Employer Criteria and Cost Sharing for Training Provided to Incumbent Workers](#)
- [Washington WorkSource System Policy # 5608: Self-Employment Training](#)
- [Washington WorkSource System Policy # 5616: Customized Training](#)
- [Washington WorkSource System Policy # 5619 Revision 1: Increased Capacity Training](#)
- Workforce Snohomish Service Plan Policy, Service Plan Procedure and Case Notes Procedure
- Workforce Snohomish Customized Training and Increased Capacity Training Policy and procedures
- Workforce Snohomish Incentives and Stipends Procedure

Supersedes:

- MEMORANDUM #13-04: Personal Training Accounts (PTAs) Including Individual Training Accounts (ITAs) and Supportive Services
- Policy Number: 1210 Needs Related Payments.
- MEMORANDUM #09-08: Classroom Training

Attachments:

- Workforce Snohomish Training Procedure
- Workforce Snohomish Work Experience Procedure
- Workforce Snohomish Supportive Services Procedure
- Workforce Snohomish Procured Training Procedure
- Workforce Snohomish Protected Personally Identifiable Information Policy
- Workforce Snohomish Conflict of interest Policy
- Workforce Snohomish Internal Controls Policy