

LAKE COUNTY WORKFORCE DEVELOPMENT BOARD  
POLICIES

Appendix D – Individual Training Account Policy

Appendix E – Supportive Services Policy

Appendix F – Local Training Provider Certification Policy

Appendix G – Lake County Purchasing Ordinance

## **POLICY 4: Individual Training Account Policy**

### I. Purpose

The purpose of this policy is to provide guidance to staff regarding the issuance of Individual Training Accounts (ITAs) for training and associated eligible costs under the Workforce Innovation and Opportunity Act (WIOA).

### II. Requirements

- Participants must be eligible under:
  - One of the following provisions of WIOA:
    - 1A – Adult;
    - 1D – Dislocated Worker;
    - Youth; or
- The Individual Training Account (ITA) is an account established by the designated one-stop operator on behalf of eligible participant/customer as defined by the WIOA or other relevant legislation.
- Participants enrolled under WIOA must select an approved training program that leads to employment in a career that is listed on the Demand Occupation List per WIA Policy Letter 09-PL-57. Eligible and approved participants may, in consultation with the designated career advisor or case manager, select an eligible program and training provider from the approved list. The list and guidance will be provided in a manner that maximizes customer choice in the selection of the training provider and program, and their career field.
- Lake County Workforce Development Department (LCWDD) staff may request additional occupations be added to the Demand Occupation List under the following conditions: new plant openings, facility expansions, or other reasons that indicate that multiple job openings exist. If the need for additions to the list is determined, a request must be submitted to the Executive Committee of the Workforce Development Board. This request should clearly outline the reason for the addition, and the anticipated job openings in the occupations. Upon approval by the Executive Committee, a request will be submitted to the Illinois Department of Commerce and Economic Opportunity for inclusion on the Demand Occupation List.
- Eligible training providers are those entities determined eligible through procedures described in WIA Policy Letter 09-PL-57.
- The use of ITAs should not be used as enticement to terminate traditional academic programs. The use of ITAs will enhance, not replace, current delivery systems in accordance with local area recommendations.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

- The Workforce Development Board may develop initial and subsequent eligibility standards for program participants beyond state policy.

### III. Procedures

- The Workforce Development Board will adhere to WIA Policy Letter 09-PL-57, Training Provider Eligibility/Program Certification for initial and subsequent eligibility.
- Training Providers will be certified through the Internet-based application and procedures developed by the state.
- Staff to the Workforce Development Board will be authorized to verify the Training Provider Certification process on behalf of the Workforce Development Board. Working with the LCWDD staff, the Board staff will conduct an analysis of available data to determine certification.
- E-Learning Providers will be approved only following reference checks and verification of authenticity of the program of courses and the institution.
- The LCWDD will use the approved Demand Occupation List and the Approved Training Provider List for all ITAs through WIOA.
- Other one-stop center partners will be encouraged to use the Workforce Development Board Approved Training Provider list when approving training programs for individuals through their funding sources.

### IV. Funding Guidelines

- The fund amount for an ITA shall not exceed \$7,000.00, with the exception of identified healthcare training, and must be for training for careers on the Demand Occupations List. Funds may be used to pay for occupational training and related pre-requisite coursework, as identified in the participant's Individualized Employment Plan (IEP), including tuition, required books, school fees, supplies and equipment as outlined in the provider's course catalog and made available to the general public. ITA funds may also be used for licensing and credentialing exam costs related to the training program and the industry recognized credential that is identified in the individual's IEP.
- In recognition of the higher cost of training for healthcare programs (i.e.: Registered Nursing), eligible participants choosing to go into the healthcare field may request and receive an ITA of up to \$10,000.
- The ITA funds of Workforce Area 1 will only be allocated and utilized by Lake County residents and/or individuals who were laid off by a Lake County employer.
- Individuals will be required to apply for other forms of federal financial aid, but Workforce Area funds will not be withheld while the individual

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

is awaiting determination of other financial aid eligibility. Individuals who are delinquent in repaying a student loan will not be automatically disqualified from being considered for an ITA, but will be counseled and advised to arrange a repayment plan with the financial institution which holds the defaulted debt.

- Individuals who utilize ITA funds will be ineligible for additional ITA funding for a five year period from the date of training completion.
- In the event that the costs of prerequisite coursework push the total costs of a participant's IEP above the appropriate funding cap, the Director of the LCWDD is authorized to approve an ITA for an amount higher than the funding caps on an individual basis in cases when he or she finds that:
  - The participant is unlikely to find employment in a high priority occupation without the training identified in the IEP; or
  - The individual is basic skills deficient; or
  - Based on their previous employment or academic achievements, the participant shows a high likelihood of successfully completing the training listed in their IEP and achieving training-related employment; or
  - The incremental costs in excess of the funding cap are minimal.
- In no case will the total amount of the ITA exceed 150% of the appropriate funding cap.

### V. Circumstances in Which an ITA May be Denied

An ITA may be denied for an otherwise qualified individual under one or more of the following circumstances:

- Training funds are exhausted;
- The individual has reached the maximum amount allowed;
- The prospective trainee does not fit the priorities in the Workforce Area's plan;
- The individual resides outside the geographic area of Lake County and/or was not laid off from a company in Lake County;
- The prospective trainee is not likely to succeed in training, based on an in-depth assessment documented by the LCWDD case manager or career specialist;
- The training course or program is not likely to result in employment upon training completion;
- The requested course or program does not lead to a career on the Demand Occupations List;
- The service provider does not accept the trainee;
- The trainee attempts to make changes to the ITA voucher without the signature of the LCWDD case manager; or

Adopted February 10, 2016

Page 11

March 24, 2017 April 4, 2016

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

- The vendor or trainee refuses to comply with reasonable Workforce Development Board or LCWDD requirements and conditions.

### VI. Exemptions

- ITA funds may be set aside for the development of individuals who are underemployed but were not previous registrants of the Workforce Area. The identified "Incumbent Workers" must be determined not to have met the Workforce Development Board's self-sufficiency definition. They also may be identified as: previous welfare recipients, members of target populations such as legal immigrants, and other targeted underemployed individuals. ITA funds may be used as an economic tool when these requirements are met.
- LCWDD staff may authorize supportive services in accordance with this policy. Participants must sign a supportive services agreement and supply all necessary and accurate information for development of the participant's supportive services plan as part of the plan approval process. All emergency supportive services requests must be authorized by the Director of the LCWDD.

### VII. Training Provider Policies

- Training costs shall be set by the provider, but may not exceed the price charged to the general public. However, if the cost of training exceeds the individual ITA, a reduced rate may be negotiated.
- Providers shall be held to the performance standards designated by the state. However, LCWDD reserves the right to develop and enforce additional standards for performance.
- If advanced payments are made to training providers for training services on behalf of a program participant, the "Letter of Intent" provided by the training provider must include:
  - The cost for each module/course included in the training program; and the cost for partial completion of any module/course included in the training program.
  - In the event that a trainee has dropped out, missed an unacceptable number of class hours, or failed to meet the standards of the training program in any other way by the midpoint in the module/course or program, the training provider will refund to LCWDD any amount paid to the training provider in excess of the partial training cost.
  - In the event that the trainee has completed more than 50% of the program, but did not complete the entire program, Workforce LCWDD staff will work with the training provider to identify refunds, depending on the uncompleted modules/courses, or to discuss opportunities for the trainee to

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

- reattempt incomplete portions of the training program, as appropriate on a case by case basis.
- ITA vouchers may be cancelled for the following reasons:
    - The training course or program is not on the Demand Occupations List.
    - The course or program, even though on the statewide list, does not meet the Lake County Workforce Development Board's performance standards and additional criteria.
    - The provider attempts to make changes to the ITA voucher without the signature of the LCWDD case manager.
    - The vendor or trainee refuses to comply with reasonable Workforce Development Board, or LCWDD requirements and conditions.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

### **POLICY 5: Supportive Services Policy for 1A, 1D, Youth and Trade Programs**

- I. Eligibility for Supportive Services
  - a. Any clients that have completed eligibility and are enrolled in training programs are eligible for supportive services reimbursements.
  - b. Supportive Services are a privilege, but not a right. As such, supportive services payments may be suspended or revoked at any time due to failure of the participant to maintain satisfactory performance and attendance in their training program.
  - c. The ability of the Lake County Workforce Development Department (LCWDD) to make supportive services payments depends on continued funding of our programs. LCWDD reserves the right to suspend or eliminate supportive services payments at any time. In the event of a suspension or termination of these payments, written notice will be provided to all participants currently utilizing supportive services.
- II. Supportive Services Eligible for Funding for 1A, 1D, Trade Programs and Youth ITAs
  - a. Transportation is the one supportive service that the LCWDD will consider for funding for 1A, 1D, Trade and Youth ITA participants.
  - b. Public transportation should be the first option for transportation services whenever practical based on the location of the participant's home and the location of their training provider.
  - c. Transportation costs may only be reimbursed on days when the participant is attending class or other required program events.
- III. Amount of Supportive Services Payments for 1A, 1D, Trade Programs and Youth ITAs
  - a. For WIOA customers participating in 1A, 1D or Youth ITA Programs:
    - i. The total amount of transportation reimbursement payments to a participant may not exceed \$2,500 per individual. Transportation becomes eligible for reimbursement on the participant's first day of training. A participant may receive transportation reimbursements throughout the length of their training program up to the \$2,500 total cap.
    - ii. For public transportation, the reimbursement will be the actual cost of the public transportation pass or ticket, or \$10 per class day, whichever is less.
    - iii. For private automobile reimbursement, the reimbursement rate will follow these guidelines:
      1. Clients who live less than one mile from their training provider will not be eligible for transportation reimbursements.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

2. Clients who live between one and five miles from their training provider will be reimbursed for \$5 per class day.
  3. Clients who live between six and ten miles from their training provider will be reimbursed for \$10 per class day.
  4. Clients who live between eleven and fifteen miles from their training provider will be reimbursed for \$15 per class day.
  5. Clients who live sixteen miles or more from their training provider will be reimbursed for \$20 per class day.
  6. No client will be reimbursed for more than \$20 per class day.
- b. For Trade customers, transportation reimbursement will be consistent with the Trade Act.
  - c. For clients that were enrolled and began their training before July 1, 2012, the previous reimbursement policy for WIOA customers shall apply until July 1, 2013. At that time, all clients will be subject to the policy as defined in section III.a.iii. The previous policy allows for reimbursement for \$10 per class day for travel within Lake County, and \$20 per class day for travel outside of Lake County. Beginning July 1, 2013, all WIOA clients, no matter when they were enrolled or began training, will follow the policy outlined in section III.a.iii.
- IV. Reimbursement Procedures for 1A, 1D, Trade Programs and Youth ITAs
- a. Reimbursement requests must be accompanied by an attendance form that verifies their attendance in class for the days for which they are seeking reimbursement. Attendance forms must be signed by instructors or other authorized staff of the training provider who can verify attendance, as well as by the participant.
  - b. It is the responsibility of the participant to ensure that the reimbursement request and attendance forms reflect true and correct information. In the event that false information is submitted as a part of a reimbursement request, including on any related paperwork, LCWDD reserves the right to disqualify that participant from any future reimbursement payments.
  - c. LCWDD staff must review and approve all reimbursement requests and associated attendance forms in advance of any payments to the participant.
  - d. Once a reimbursement request and all related paperwork has been submitted, it will be processed and payment will be made to the participant, as appropriate, within 90 days.
- V. Eligible Supportive Service for Contracted Youth Programs



LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

- a. For contracted Youth Programs, Supportive Services can include any service allowed under the Workforce Innovation and Opportunity Act, as long as those services are outlined in the program design, included in the program budget, and agreed to in the contract for youth services. Reimbursement for supportive services should follow the regular invoicing procedure, as outlined in the contract for youth services.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

### **POLICY 7: Local Training Provider Certification Policy**

#### I. Purpose

To define the standards for training providers applying for program certification under Lake County Local Workforce Investment Area1 (LWIA 1) to be identified as eligible to receive Workforce Investment Act (WIA) Title I funds.

#### II. References

WIA Legislation and rules and Regulations, Department of Commerce and Economic Opportunity Policy Letter NO.09PL57

#### III. Background

The Lake County Workforce Investment Board (Local Workforce Investment Area 1, or LWIA 1) is issuing this policy in order to ensure accountability and compliance to policies related to Training Provider Certification issued by the Illinois Department of Commerce and Economic Opportunity (DCEO).

On September 28, 2000 the Lake County Workforce Investment Board delegated the responsibility of reviewing and certifying training programs to the Board staff. At the regular meetings of the Marketing and Employer Linkages Committee, staff shall present updates on approved, rejected, and recertified programs.

#### IV. Program Eligibility

1. Training programs must be occupational in nature in high growth/high demand industries/occupations within the Northeast Illinois Economic Development Region based on the State of Illinois Demand Occupation Training List (DOTL). The list is available online at [www.lakecountyjobcenter.com](http://www.lakecountyjobcenter.com).
2. All programs of study must lead to training related jobs and attainment of an occupational skill certificate, industry recognized certification and/or licensure.
3. Colleges, universities and technical schools must be accredited by the Illinois Community College Board (ICCB), North Central Association (NCA), or any other Federal or State accrediting agency.
4. Training institutions, business, community based agencies, proprietary schools or other training providers must meet the following requirements:
  - a. Be certified, approved and/or recognized by a State, Federal or nationally recognized industry standard association for a minimum of a year.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

- b. Individual programs, for which the institution is seeking initial approval or program re-certification must be certified by the Illinois State Board of Education (ISBE), or by a State, Federal Agency or nationally recognized industry standard association (appropriate to the training offered).
5. Training provider with multiple training site locations will only be approved by LWIA 1 if the provider has at least one training location in Lake County. Once a training provider is approved by LWIA 1, they may submit any of their training programs for approval through LWIA 1. Providers that offer only online training do not need to be physically located in Lake County in order to apply for certification in LWIA 1.
6. Out-of state training providers will be considered for approval only when it has been established that no other compatible training is available in Illinois or it has been determined (documented by assessment of the client needs) that it would be in the best interest of the client to attend the out-of-state provider. Additionally, the out-of state provider must be currently approved as an approved Training Provider by the WIA program in their home state.
7. Training provider must fully comply with all non-discrimination and equal opportunity provisions of the law.
8. Training providers must be open for business for at least one year prior to their application in order to be considered. Open for business is defined as having documented, and providing verification of the following:
  - a. Legal and good standing state and/or locally registered business;
  - b. FEIN;
  - c. Physical location to provide training (not applicable for online training providers);
  - d. Proof of delivery and outcomes of training services and training related job placement services;
  - e. Proof of accreditation;
  - f. Copy of training catalog;
  - g. Training institution tuition refund policy; and
  - h. Proof of published program/tuition cost.

### V. Application and Review Process

1. Once Board staff has evaluated the eligibility of the training program, an IWDS account will be established for the training provider, if one does not already exist. The training provider will be required to submit all required information via the Illinois Workforce Development System.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

2. After completion of the online application for certification, the Workforce Investment Board staff will contact the training provider to complete an interview and/or site visit to review:
  - a. Physical location (not applicable for online training providers)
  - b. Quality of instructors
  - c. Accessibility and Equal Opportunity (EEO) compliance
  - d. Student-to-teacher ratio
  - e. Curriculum structure
  - f. Placement outcomes and salary expectations of graduates
  - g. Commitment and evidence of the ability to maintain records of completion and/or transcripts for five years
3. Upon completion of the application, the Workforce Investment Board staff will make a determination regarding approval of the school/institution and programs. It is possible that not all eligible programs will be approved. Considerations for approval of a training program include:
  - a. The cost of the training program must be similar to the costs for other similar training programs in the same field.
  - b. Job placement rates in the field of study.
  - c. Salaries of students placed in jobs.
  - d. Job availability in the local area.
4. Upon Board staff approval, the training provider and program will go on the state list of eligible training providers for a period of one year.
5. Board staff will respond to applications no later than 30 days after all information has been submitted.

### V. Program Re-Certification (Subsequent Eligibility) Requirements

1. After initial certification, all programs require re-certification within one year of the original certification. It is required that all programs be re-certified within the sixty days prior to the one year anniversary. For example, if a program's initial certification is January 31, 2011, the re-certification must be completed between December 1, 2011 and January 31, 2012. Also, training programs are subject to re-certification if any significant program changes occur.
2. Program re-certification will be evaluated by the same requirements as initial certification.
3. Programs that fail to apply for recertification during the appropriate period may not be able to reapply for recertification for a period of six months from their original anniversary date. For example, if a program's certification expired on July 1, 2012, and the training provider failed to apply for recertification between May 1, 2012 and

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

June 30, 2012, the training provider could not apply for recertification until January 1, 2013.

4. Additionally, all eligible training providers seeking recertification through LWIA 1 will be required to meet at a minimum the following program performance outcomes:
  - a. Entered Employment Rate of 40%; and
  - b. Employment Retention Rate of 40%; and
  - c. Average Earnings of \$2,000 or greater; and
  - d. Credential Attainment Rate of 20%.
5. Programs seeking re-certification that fail to meet any of the WIA performance measures will be subject to removal from the Approved Provider Lists. Once the program is taken off the Approved Provider Lists no new students can be funded by WIA Individual Training Accounts. Programs that fail to meet the requirements for recertification may reapply after twelve months from the date of the expiration of their previous certification.
6. For the purpose of annual re-certification, programs that do not have enough participants to have results posted in IWDS are exempt from the performance outcome requirements. However, LWIA 1 staff will monitor performance based on available outcome data and may deny recertification if outcomes are not consistent with the standards outlined in this policy.

### VI. Extraordinary Circumstances

1. A training provider may be decertified at any time if:
  - a. It is determined at any time that a training provider intentionally supplied inaccurate information in its application for certification or recertification of a training program;
  - b. The training provider substantially violated any requirement under the Workforce Investment Act, or
  - c. The training provider voluntarily chooses to cease being an eligible training provider, or goes out of business.

### VII. Notification and Appeal Procedures for Providers Denied Eligibility or Program Certification/Recertification

1. In the event that a program is denied certification or recertification, Board staff will notify the training provider in writing. The notice will include:
  - a. The training program(s) that are being denied certification;
  - b. The reason(s) for the denial; and
  - c. Information about the opportunities the provider has to appeal the decision.

## LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

2. The notice must be sent within seven (7) business days to the training provider via registered mail with a copy sent to DCEO's Office of Education and Training (OET).
3. The training provider has twenty-one (21) days, from the date of receipt of the notice of denial of the certification of any or all training program(s) for which it sought certification, in which to file an appeal to the Lake County Workforce Investment Board. The appeal must include the following information:
  - a. A statement that the training provider is appealing the denial of its program(s) certification;
  - b. The reason(s) the certification should be granted;
  - c. Contact information for additional information; and
  - d. The signature of the chief executive of the training provider.
4. The appeal must be submitted formally, in writing and must be sent by registered mail no later than the 21<sup>st</sup> day from the date of receipt of the notice of denial.
5. The Lake County Workforce Investment Board will review the request for appeal within twenty-one (21) days of its receipt.
  - a. If the decision is reversed, the Lake County Workforce Investment Board will notify the training provider in writing and forward a request to DCEO's OET to add the program to the approved program list.
  - b. If the decision is not reversed, the Lake County Workforce Investment Board will notify the training provider via registered mail within twenty-one (21) days from the receipt of the appeal request. The notification will include information about opportunities for the provider to appeal its denial of certification with DCEO's Office of Employment and Training. The Lake County Workforce Investment Board will forward a copy of the letter to DCEO's OET.

### VIII. Monitoring & Oversight

Lake County Workforce Investment Board staff will conduct monitoring of all eligible training providers and their certified training programs.

LAKE COUNTY WORKFORCE DEVELOPMENT BOARD

**POLICY 9: Procurement Policies**

All purchasing is governed by the Lake County Purchasing Ordinance, which is attached.