

## Adult, Dislocated Worker Program

July 2004

**1) *Are there income and other eligibility requirements for obtaining ITAs (Individual Training Accounts)?***

If you are going to serve the individual as a youth, the income eligibility (Section 664.200 of WIA regulations) for youth services apply, and the youth program does not use individual training accounts.

WIA requires a determination that employed adults and dislocated workers need intensive or training services to obtain or retain employment that allows for self-sufficiency. The self-sufficiency eligibility limiter helps to ensure the intensive and training services are provided to employed adults and dislocated workers most-in-need of such services, such as individuals employed in a low skill/low wage jobs.

For determining eligibility of employed adults and dislocated workers for intensive and training services, the WIA regulation requires that self-sufficiency means employment that pays at least 100% of the lower living standard income level (LLSIL).

Local boards are responsible for establishing criteria for determining what self-sufficiency means in their local area. The 100% threshold is only the floor. The self-sufficiency threshold may be set higher than the 100% if the local board chooses. Local areas are also responsible for developing local policy on individual training accounts.

You should review you local area policy on self-sufficiency and issuing individual training accounts to determine how to serve the individual.

**2) *We would like to provide a job readiness training class to WIA customers who need it. We would like to do a 40-hour course, with a pre-test and post-test, and take a credential if they successfully complete the program. We would want to do this as a training activity so the credential would count towards performance. Would we be able to send in an Individual Training Account (ITA) application for ourselves to do this?***

The job readiness class you described is considered to be pre-vocational services, which are intensive services. See WIA, Section 134(d)(3)(C)(vi). Pre-vocational services are short term services, which include development of learning skills and professional conduct to prepare individuals for unsubsidized employment or training. Pre-vocational services could include, but are not limited to, training in communication skills, interviewing skills, punctuality, personal maintenance, and “soft skills” training such as those items listed in your Skill Shop Syllabus and the Job Readiness Training Credentials documents. Individuals registered in WIA and

receiving intensive services are counted for performance. Adults and dislocated workers who are not in training are not counted in the credential measures.

Pre-vocational services do not require an Individual Training Account and are not included with training programs submitted through an application for the Eligible Training Provider (ETP) list. Intensive services may be provided directly through One-Stop operators or through contracts with service providers.

To help determine credentials individuals may receive, refer to Workforce Investment Act Guidance Letter 9, WIA Credentials, which is posted on [ohioworkforce.org](http://ohioworkforce.org). Keep in mind that to meet performance, individuals need both the credential and employment.

**3) *Do you know the best person to contact regarding best practices for developing incumbent worker training programs?***

Because the state has not set aside money for an incumbent worker training program, I do not know which local areas may have funding to do this type of training. Also, incumbent worker training cannot be funded with the WIA adult and dislocated worker formula money at the local level. It is a statewide activity.

There is a fine line between employed adults and dislocated workers in low skilled jobs and an incumbent worker training program. See Section 134(a)(3)(A)(iv)(I) of the Act and the Preamble in the regulations, page 49,326, third column, Subpart C – Training Services.