

SFWIB INDIVIDUAL TRAINING ACCOUNT (ITA) PROCEDURES

I. Purpose

The purpose of the ITA Procedures is to provide an updated process for Training Vendors and SFWIB Contractors (hereinafter sometimes referred to as service providers or authorized representatives) as it pertains to the administration of ITAs, including the refund process.

II. Performance

A. **Training Vendors** are required to satisfy a **minimum of three (3)** of the following performance measures relevant to each training program offered. Two of the three performance measures must be the Placement after Training and Postsecondary Credential Attainment Rate standard.

Performance Measure	Definition	Performance Standard
Completion Rate	The percentage of participants who successfully complete training in an approved SFWIB program.	70%
Placement After Training	SFWIB participants who completed training and have been placed in unsubsidized employment within 180 days of the training completion.	70%
Training-Related Placement	SFWIB participants who have a training outcome and obtained unsubsidized employment in a training-related occupation within 180 days of the outcome. All training related placements must have a wage rate at or above the training program's Quadrant Benchmark.	70%
Postsecondary Credential Attainment Rate	A measure that examines SFWIB participants who, during a program year, obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from a training program; or who are in an education or training program that leads to a recognized postsecondary credential or employment and are achieving measurable skill gains toward such a credential or employment within one year after exit from the program.	70%
Economic Benefit Per Placement	The percentage of the return on investment per approved training program for each participant placed. The approved program must meet and/or exceed the standard economic benefit per placement by quadrant.	Quadrant Benchmark*

* The approved program must meet and/or exceed the standard economic benefit per placement by quadrant as shown in the table below:

Growth and Salary Rate Category	Quadrant Benchmark
Low Growth / Low Wage	\$14,785
High Growth / Low Wage	\$12,493
Low Growth / High Wage	\$31,542
High Growth / High Wage	\$29,201

Annually, South Florida Workforce Investment Board (SFWIB) Office of Continuous Improvement (OCI) shall conduct a performance audit to determine Training Vendors' compliance with the above measures. Training Vendor programs failing to meet the minimum required performance measures will be removed from the list of SFWIB approved offerings. For a program to return to the approved offerings list, it must be resubmitted for a programmatic review and SFWIB approval, no earlier than a year from the date of removal.

- B. SFWIB Contractors** are required to meet contractual performance measures as set forth in the SFWIB Balanced Scorecard. A contractual percentage hold back is applied to Contractors failing to satisfy the measures.

III. Definitions:

Actual end date: the date that the participant successfully completes the approved training program.

Actual start date: the date that the participant commences classes.

Authorized party: person or persons duly authorized to sign on behalf of a Training Vendor or Contractor. Authorized parties are documented on the Organizational Responsibility Form submitted with the Training Vendor Agreement or Contract.

Assessment: the process whereby individuals are interviewed and/or tested to determine their employability, motivation, aptitude, abilities and interests in order to develop a career plan for the attainment of the individual's career goals.

Balanced Scorecard: a performance metric used to show Contractors' compliance with Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser, Welfare Transition and employer-related measures.

Completion: the participant's attainment of a credential, i.e. certificate or degree or competencies needed for a specific job or occupational group at the conclusion of the approved training program.

Eligibility: the process whereby a participant is determined to meet the requirements of the Workforce Innovation and Opportunity Act, Temporary Assistance to Needy Families (TANF), or any SFWIB funded program in order to receive training services.

Employment: an unsubsidized occupational activity or service performed for an entity (i.e., government, not-for-profit, and for-profit) for compensation.

Employment Verification Form: the system-generated universal form that employers complete and sign verifying participant's placement information, i.e., job title, hourly

wage, beginning date, and employer information.

Enrollment date: the date the Service Provider enrolls a participant in an approved training program; for the Training Vendor, it is the date that it receives the Individual Training Account (ITA) voucher from a participant and enrolls that participant in an approved training program.

Estimated start date: the date the Service Provider anticipates the Training Vendor's enrollment of the participant in the approved training program; this date must be **entered before a voucher can be issued** (can be no greater than three months from date of data entry).

Estimated end date: is based on the program's length. It is the date that the Service Provider anticipates the participant's will complete the program. This date must be **entered into the Workforce Management System (WFMS) before a voucher can be issued** (which can be no greater than two (2) years from the estimated start date).

Individual Training Account (ITA): a training funds account that is established for individuals who have been determined eligible by the SFWIB authorized representative, or Contractor, to receive SFWIB funded training, in approved training activities at an approved Training Vendor.

License: follows the completion of an approved training program. The licensure attained upon the passing of a regulatory body's examination requirements.

Office of Continuous Improvement: the SFWIB's Department that monitors conformance with established rules, policies, procedures, and performance measures.

Participant Attestation of Training: the system-generated form given to the participant by the Training Vendor, completed and signed by the participant, certifying the participant's completion of the approved training program.

Participant Refund/Drop/Withdrawal Form: the system-generated form that is completed and signed by the Training Vendor detailing the reason for drop/withdrawal/refund and the applicable refund amount as set forth in SFWIB's Standardized Refund Policy.

Pell Grant: the federal grant that eligible participants are required to apply for to assist in paying for the costs of a training program.

Performance Measures/Standards: local standards to measure a Contractor's and Training Vendor's compliance with federal and state training requirements.

Placement Rate: the number of participants that obtain unsubsidized employment following completion of a training program.

Prerequisite: courses that must be successfully completed before other courses within the program may be taken.

Reconciliation requirements: the review process whereby Contractors and Training Vendors identify, compare and check data for input into the Workforce Management System (WFMS) to ensure data accuracy.

Remedial: a course taken to prepare for a required course in an approved training program; **participants may take up to two program-related remedial courses.**

Reverse referral: where an individual is enrolled in an approved training program and seeks workforce assistance (an ITA voucher) without following statutory protocol, i.e. undergo core and intensive services.

Workforce Management System (WFMS): the system for tracking participants' training-related

information, i.e., expenditures and performance data.

Termination Date: the participant's last date of actual attendance in an approved training program.

Training Program: a Board-approved area of study linked to an occupation seen on the current Targeted Occupations List for Workforce Development Area 23.

Training-related placement rate: the number of participants that obtain unsubsidized employment in an occupational area relevant to the training program completed.

Voucher: the system-generated instrument issued to pay for an approved training program for which an ITA has been established. For the instrument to be valid, it must have all required signatures i.e., participant, authorized representative and supervisor signatures.

Withdrawal/Drop date: when the Training Vendor determines, or is informed by the participant, that the participant will stop attending and not continue training.

IV. Procedures:

A. Training Vendor Roles and Responsibilities:

1. Each Training Vendor is responsible for assessing participants referred to its program to ensure that the participant will be successful in the program prior to enrollment.
2. Before a Training Vendor may receive a voucher, the Vendor must provide the Service Provider documentation evidencing all applicable program requirements and cost information.
3. The Training Vendor shall ensure that the voucher received is issued in the Training Vendor's name, and it is properly signed before it is invoiced; all invoiced vouchers received failing to comply with the procedures set forth herein will be returned to the Training Vendor unpaid.
4. Each Training Vendor is responsible for entering training-related data into WFMS, specifically for the following fields:
 - a. Enrollment date (Enroll): The date that the Training Vendor receives the Individual Training Account (ITA) voucher from a participant and enrolls that participant in a training program.
 - b. Estimated start date: (Can be no greater than three months from date of data entry).
 - c. Estimated end date: (Can be no greater than two (2) years from the estimated start date).
 - d. Actual start date: The date that the participant commences classes.
 - i. To submit the voucher to SFWIB for payment, the actual start date must be entered in WFMS and the participant must attend 14 consecutively scheduled classes.
 - ii. Entering the date in the "actual start date" field will activate the 14-day invoicing requirement.
 - iii. Documentation that the participant has fulfilled 14 consecutively

scheduled classes shall be furnished by the Training Vendor to the applicable Service Provider **before** an invoice is submitted for payment to SFWIB.

Caution: The **14-day** invoicing clock resets each time this field is updated.

- e. Pell Grant information (for eligible participants)
 - i. Pell Eligible (yes or no):

If eligibility is unknown at the time of enrollment, the field may be left blank. The field shall be completed no later than the 50% completion of training date.

- ii. Amount Awarded:

If the award is unknown at the time of enrollment, the field may be left blank. The field shall be completed no later than the 50% completion of training date.

- f. Training progress information
 - i. 25% completion of total program hours
 - ii. 50% completion of total program hours
 - iii. 75% completion of total program hours
 - iv. 100% completion of total program hours

- 5. Each Training Vendor is responsible for verifying employment and entering employment-related data into WFMS, specifically the following:
 - a. Employment information (required to close the training enrollment)
 - i. Employment attainment date (hired date)
 - ii. Employer's name
 - iii. Occupation title
 - iv. Hourly wage
 - b. Completion of the SFWIB Employment Verification Form (EVF)
 - i. The Training Vendor has the option to use the standard EVF or to insert its own logo into the EVF; the form is accessible from the reconciliation tool beside the Entered Employment Yes/No question.
 - ii. Send the EVF to the employer and perform follow-up:
 - a) The original form must be submitted or returned by the employer via US Mail, e-mail or fax to the Training Vendor.
 - b) If the form is received through US Mail, the form must be date stamped or the envelope in which it was received shall be kept on file.
 - c) If the form is received through e-mail, a copy of the email must be printed and attached to the form and placed in the participant's file.
 - d) If the form is received via fax, the form must have the employer's name and telephone number imprinted on the header.
 - e) A copy of the form must be submitted by the Training Vendor via e-mail or sent by fax to the Service Provider.

- 6. Each Training Vendor is responsible for entering completion information into

WFMS, specifically the following fields:

- a. Actual End Date: The date that the participant successfully completes the approved training program.
 - b. Training Outcome:
 - i. Successful Completion:

The participant completes and signs the SFWIB **Participant Attestation of Training Completion Form** and provides it to the Training Vendor who then submits a copy of the Form to the Service Provider via e-mail (scanned) or fax.
 - ii. Credential Attained Date
 - iii. Dropped/Never Attended:

If the participant drops or never attends, the Training Vendor shall complete the **Participant Refund/Drop/Withdrawal Form** which shall be submitted with the applicable refund check to SFWIB. Refer to the **Refund Procedures in Section IV – E** below. The Training Vendor shall submit via e-mail or fax a copy of the form to the Service Provider.
 - c. Certification of Completion
 - d. Credential Attainment date
 - e. Type of Credential attained
7. Training Vendor Cost Interface Tool
- Training Vendors are required to submit program cost modifications with supporting documentation to SFWIB staff, **no later than April 1st** of the current Program Year (PY) for the next PY. The Training Vendor shall complete the following pages:
- a. Corporate Profile
 - b. Training Locations
 - i. Request to Add New Location, if applicable
 - c. Program Information
 - d. Program Information
 - i. Updating program cost
 - ii. Request to Add New Program, if applicable
 - iii. Select Target Occupations
 - iv. Comments box
 - v. Selecting a Comparable Public School Program
 - a) One comparable public school program match: the system selected one comparable public school program; where you agree with the system-generated selection, no further action is required; vendors may suggest an alternative by clicking on the select button and then the suggest button and entering the following data: the program's name, CIP code and cost information; the vendor must forward the curriculum and applicable pages of the school catalog including cost to the SFWIB Policy Manager; the vendor must verify that the suggested program appears on Workforce Development Area 23's Targeted Occupations List.
 - b) Multiple comparable public school matches: where there are multiple

matching public school programs, the vendor must click on the select button and do one of the following:

- (i) Click select by the listed program that you determine is most comparable; upon that selection, no further action is required;
 - (ii) To suggest an alternative, click the suggest button at the top of the screen and enter the following information: the program's name, CIP code and cost information; the school must forward the curriculum and applicable pages of the school catalog including cost to the SFWIB Policy Manager; the vendor must verify that the suggested program appears on Workforce Development Area23's Targeted Occupations List.
- c) No match: where there is no matching program, the vendor must click the select button and enter the following data: the program's name, CIP code and cost information; the school must forward the curriculum and applicable pages of the school catalog including cost to the SFWIB Policy Manager; the vendor must verify that the suggested program appears on Workforce Development Area23's Targeted Occupations List.
- e. Submit the Application

Upon submission, the vendor is attesting to the accuracy of the data entered and no further edits will be permitted unless authorization to further edit is granted by the SFWIB Policy Manager.

B. Service Provider Roles and Responsibilities:

1. The Service Provider is required to individually assess program eligible participants for training prior to the enrollment and issuance of an ITA voucher. The assessment process consists of examining a participant's academic and employment background as well as short- and long-term career interests. The intent of this process is to assist the participant in selecting a training program he/she is likely to succeed in.
2. If an eligible participant is determined to need remedial courses, SFWIB will only assist in covering the tuition costs of **up to two (2) remedial courses** linked to an approved training program; vouchers issued to cover the costs of remedial course(s) will be subtracted from the maximum allowable ITA amount.
3. The Service Provider must be in receipt of the appropriate program and cost documentation from the Training Vendor before the Service Provider issues a voucher.
4. The Service Provider shall ensure that the voucher is issued only to eligible participants, to an approved Training Vendor, for the correct approved training program and it is properly signed.
5. Service Providers are responsible for entering training-related data into WFMS, specifically the following:
 - a. Enrollment in a SFWIB approved training program
 - b. Issuance of a voucher
 - i. Enrollment date; the date that the participant is enrolled in an approved program.
 - ii. Estimated start date (can be no greater than three months from date of data entry).
 - iii. Estimated end date (can be no greater than two (2) years from the estimated

start date).

- iv. Upon successful entry of the estimated start and end dates, a voucher may be issued covering up to and including 50 percent of the maximum approved ITA amount; that 50 percent applies to the total tuition amount.
- v. At the midpoint, or 50% of the training program, a voucher may be issued for the remaining maximum ITA amount; that remaining 50 percent applies to the total tuition amount; this voucher cannot be issued until the Service Provider receives documentation showing the participant is at the training program's actual midpoint.

Note: WFMS calculates the midpoint by using the actual start date and the estimated end date entered by the Training Vendor.

- 6. Pell information (for eligible participants)
 - a. Pell Eligible:
 - i. If eligibility is unknown at the time of enrollment, the field may be left blank.
 - ii. The field shall be completed no later than the 50% completion of training date.
 - b. Amount Awarded
 - i. If award is unknown at the time of enrollment, the field may be left blank.
 - ii. The field shall be completed no later than 50% of completion of training date.
- 7. Each Service Provider is responsible for verifying employment and entering employment-related data into WFMS, specifically the following:
 - a. Employment information (required to close the training enrollment):
 - i. Employment attainment date (hired date)
 - ii. Employer's name
 - iii. Occupation title
 - iv. Hourly wage
 - b. Completion of the SFWIB Employment Verification Form (EVF):
 - i. The Training Vendor has the option to use the standard EVF or to insert its own logo into the EVF; the form is accessible from the reconciliation tool beside the Entered Employment Yes/No question.
 - ii. Send the EVF to the employer and perform follow-up:
 - a) The original form must be submitted or returned by the employer via US Mail, e-mail or fax to the Training Vendor.
 - b) If the form is received through US Mail, the form must be date stamped or the envelope in which it was received shall be kept on file.
 - c) If the form is received through e-mail, a copy of the email must be printed and attached to the form and placed in the participant's file.
 - d) If the form is received via fax, the form must have the employer's name and telephone number imprinted on the header.
 - e) A copy of the form must be submitted by the Service Provider via e-mail or sent by fax to the Training Vendor.
- 8. Each Service Provider is responsible for entering completion information into WFMS, specifically the following fields:

- a. Actual End Date: The date that the participant successfully completes the approved training program.
- b. Training Outcome:
 - i. Successful Completion:
The Training Vendor submits a copy of the Form to the Service Provider via US Mail, e-mail (scanned) or fax.
 - ii. Credential Attained Date
 - iii. Dropped/Never Attended:
The Training Vendor submits a copy of the Form to the Service Provider via US Mail, via e-mail (scanned) or fax.
- c. Certification of Completion
- d. Credential Attainment date
- e. Type of Credential attained

C. Joint Responsibilities of Service Providers and Training Vendors

- 1. All required fields as set forth below and in the Training Vendor and Service Provider Roles and Responsibilities sections above shall be reconciled on a monthly basis, i.e., Training Vendors and Service Providers shall communicate to verify the accuracy of the data entered in WFMS.
 - a. Estimated end date
 - b. Pell Grant information
 - c. Actual start date
 - d. Actual end date
 - e. Training Progress
 - f. Training Outcome
 - g. Certification of Completion
 - h. Credential Attainment date
 - i. Type of Credential obtained
 - j. Entered Employment Information
 - (i) Where the Service Provider location is unable to verify the participant employment information in the EVF provided by the Training Vendor, for a discrepancy to not occur both the Provider and Vendor may agree to place a checkmark in the checkmark column for that case; where the participant acquired employment at a later date, that information does not have to be recorded in WFMS.
 - k. Employment attainment date (hired date)
 - l. Employer's name
 - m. Occupation title
 - n. Hourly wage
- 2. Training Program Reconciliation Requirements
 - a. Training Vendors and Service Providers must enter participants' training performance data in the Reconciliation Tool (Tool) found on the WFMS homepage.
 - b. The log-in for the Tool is the Training Vendors' and Service Provider's WFMS ID.

- c. The Tool tracks whether a record has been reviewed and reconciled.
 - i. The reconciliation tool displays a **red flag** when:
 - a) The estimated end date is less than today's date and the actual end date field is empty; and/or
 - b) The estimated start date is less than today's date and the actual start date field is empty.
 - ii. The reconciliation tool displays a **yellow flag** when:
 - a) Today's date is greater than the actual start date of training plus two (2) years; and the actual end date field is empty.
 - d. The Tool generates a report detailing any field discrepancy between Training Vendors and Service Provider locations; this report is available from the 1st of each month.
3. Data entry and reconciliation is an ongoing process, the following timeframes shall be followed to ensure data is reconciled monthly:
- a. From the **1st** of the month through and including the **10th** of the month:
 - i. The Training Vendor and the Service Provider's location have up to the **10th** of each month to review and update participants' training data and placement information; following review and update, the Vendor and Provider shall click the review button.
 - b. From the 11th of the month through and including the 15th of the month:
 - ii. The Training Vendor and the Service Provider location shall reconcile data starting no later than the **11th** of each month through and including the **15th** of the month utilizing the **Training Discrepancy Report** to review and update participants' training data and placement information.
 - c. On the **16th** of the month, if the discrepancy report shows that both the Service Provider location and the Training Vendor have failed to comply with reconciliation requirements, the Service Provider location will be barred from enrolling new participants into any training program and the Training Vendor will be barred from receiving ITAs for new participants from all Service Providers.
 - i. If the Training Vendor has complied by having entered and reviewed the required fields but the Service Provider location has failed to do likewise, that Career Center location will be barred from enrolling new participants into any training program.
 - ii. If the Service Provider location has complied by having entered and reviewed the required fields but the Training Vendor has failed to do likewise, the Training Vendor will be barred from receiving ITAs for new participants from all Career Centers.
 - iii. Upon compliance with the reconciliation requirements the Service Provider location and/or Training Vendor's privileges will be wholly restored.
4. **SFWIB Office of Continuous Improvement (OCI) will monitor compliance with performance requirements.**

5. Documentation supporting each field entry must be placed in the participant's file and be available for OCI's review. SFWIB Office of Continuous Improvement will review the following examples of supporting documentation to determine a Training Vendor's and Service Provider's compliance with the placement requirements:
 - i. Employment Verification Form completed by the employer; or
 - ii. For companies that use the Work Number system, attach the employer's printout to the Employment Verification Form; or
 - iii. Pay stub in conjunction with documented employer contact, or Employment Offer Letter; or
 - iv. New Hire Report in conjunction with documented employer contact to indicate actual start date of employment; or
 - v. The Unemployment Insurance (UI) system and/or SunTax with documented employer contact; or
 - vi. For Self-Employed individuals, attach Form 1099 – Misc (Miscellaneous Income) and/or Form W- 4.

D. Training Vendor Invoicing

14-day invoicing requirement: for a voucher to be submitted for payment to SFWIB the actual start date must be entered in WFMS and the participant must attend 14 consecutively scheduled classes.

1. The invoice submitted for payment to SFWIB must be signed and dated by an authorized party; authorized parties are documented on the Organizational Responsibility Form submitted with the Training Vendor Agreement.
2. In the event a SFWIB participant withdraws from the training within three (3) business days of signing the Training Vendor's enrollment contract the Training Vendor shall not submit an invoice, since the 14 days have not elapsed.
3. In the event a SFWIB participant withdraws from the training after the third (3rd) business day of signing the enrollment contract but prior to the first day of class, the Training Vendor shall invoice only the registration fee.
4. For Training Vendors with a drop/add period, in the event a SFWIB participant withdraws from training on or before the first week of class (posted drop/add period) the training vendor shall invoice only the registration fee, since this occurs within the 14 day period.

E. Training Vendor Refunds to SFWIB

1. Refund Types

- a. **PRO-RATED REFUND:** For Training Vendors that currently use a pro-rata refund formula the following applies:
 - i. Where withdrawal occurs after classes have commenced, but prior to fifty percent (50%) completion of the training a pro-rated refund of tuition, **less the registration fee** is computed based on the following:
 - a) Where the period of enrollment is computed on the basis of program-time

- elapsed, expressed in clock hours, the pro-rated refund of tuition computed on the number of hours completed to the total program hours.
- b) Where SFWIB pays for training per term, quarter, semester, the pro-rated refund of tuition is computed based on the number of hours completed per term, quarter or semester to the total hours per term, quarter, or semester.
 - c) The guidelines listed below shall be followed by the Training Vendor when calculating the refund due SFWIB.

% of Program Completion	Tuition Refund due to SFWIB
1 to 10%	99 – 90%
11 to 20%	89 - 80%
21 to 30%	79 - 70%
31 to 40%	69 - 60%
41 to 50%	59 - 50%
Over 50%	0%

Note: if course is dropped prior to the 14th day, and no invoice was submitted to SFWIB, no refund is due. If an invoice was submitted, follow the table above to calculate refund amount.

- ii. After completing fifty percent (50%) or more of the program shall result in no refund, unless the school’s accreditation Board specifies a refund that is greater than 50%.
- b. **DROP/ADD REFUNDS:** For Training Vendors that currently use drop/add the following applies:
- i. In the event a SFWIB participant withdraws after the posted drop/add period there is no refund due to SFWIB.
 - ii. In the event a SFWIB participant is withdrawn from a class due to a class cancellation, SFWIB is entitled to a full refund.
 - If class is cancelled after the 3rd day but before the 14th day: no invoice is submitted;
 - If class is cancelled after the 14th day, and an invoice has been submitted and paid: a refund shall be submitted to SFWIB.
2. **Refund Process:**
- a. The Training Vendor shall enter into WFMS the withdrawal date within **five (5) days** of the SFWIB participant’s termination from training for the refund calculation.
 - b. The Training Vendor shall notify in writing within **five (5) days**, the SFWIB participant’s career advisor at their career center that the participant has **been terminated/withdrawn from school** and that a refund is or is not due to SFWIB. The training vendor will complete the system generated drop/withdrawal form and indicate the reason for the drop/withdrawal and provide the refund calculation.
 - c. All refunds shall be submitted to SFWIB within **thirty (30) days** of the effective date

of termination or withdrawal. Make check(s) payable to “South Florida Workforce Investment Board”.

Note: Termination Date for Refund Computation Purposes - the last date of actual attendance by the participant shall be used as the termination date for refund computation purposes.