**WIOA Young Adult Program**

**Chapter 12: Individual Training Accounts (ITAs)**

Summary   
Individual Training Accounts (ITAs) can be an important tool in assisting both in-school youth, ages 16-21, and out-of-school youth, ages 16-24, in completing education and training coursework as part of a career pathway.

Relevant Laws, Rules, or Policies   
[Workforce Innovation and Opportunity Act (Public Law 113-128)](http://www.gpo.gov/fdsys/pkg/PLAW-113publ128/html/PLAW-113publ128.htm)

[WIOA Final Rule (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf)

[WIOA Final Rule: Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-14 (Dated 3-26-15)](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4244)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 8-15 (Dated 11-17-15)](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6073)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 21-16 (Dated 3-2-17)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7159)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 7-18 (Dated 12-19-18)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=4255)  
[U.S. Dept. of Labor Training and Employment Guidance Letter No. 14-18 (Dated 3-25-19)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7611)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 11-19 (Dated 2-6-20)](https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-11-19)  
[U.S. Dept. of Labor Training and Employment Notice No. 22-19 (Dated 4-3-20)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=8754)  
[Office of Management and Budget Code of Federal Regulations 2 CFR 200](https://gov.ecfr.io/cgi-bin/text-idx?SID=970b58af63fde7ba10fd201add7ec48c&mc=true&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (Uniform Guidance)  
[U.S. Dept. of Labor Training and Employment Notice No. 12-21 (Dated 10-15-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=9977)  
[U.S. Dept. of Labor Training and Employment Notice No. 14-21 (Dated 10-27-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6118)  
[U.S. Dept. of Labor Training and Employment Notice No. 18-21 (Dated 1-4-22)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3439)  
[2018 WIOA Core Monitoring Guide](https://doleta.gov/grants/pdf/2018_Core_Monitoring_Guide.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 10-16, Change 3 (Dated 6-11-24)](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2023/TEGL%2010-16%20Change%203/TEGL%2010-16%2C%20Change%203.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 1 (Dated 10-25-22](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2019/TEGL%2023-19%20Change%201/TEGL%2023-19%2C%20Change%201%20%28Complete%20document%29.pdf))

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 9-22 (Dated March 2, 2023)](https://www.dol.gov/agencies/eta/advisories/tegl-09-22)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 2 (Dated 5-12-23)](https://www.dol.gov/agencies/eta/advisories/tegl-23-19-change-2)

[Approved ISY ITA Waiver Request, dated June 14, 2024 (attached)](#Signed_MN_2024_Waiver_Response_Letter)

Effective Date   
06/01/2020

Last Updated   
4/1/2025

Contact   
Kay Tracy

Email: [Kay.Tracy@state.mn.us](mailto:Kay.Tracy@state.mn.us)  
Phone: 651.259.7555

Cory Schmid

Email: [Cory.Schmid@state.mn.us](mailto:Cory.Schmid@state.mn.us)

Phone: 651.259.7541

Policy

In order to enhance individual participant choice in their education and training plans and provide flexibility to service providers, DOL allows, with Minnesota’s approved waiver, Workforce Development Areas (WDAs) to use ITAs for both in-school youth, ages 16-21, and out-of-school youth, ages 16-24, using WIOA youth funds when appropriate. WDAs wanting to take advantage of this waiver to serve in-school youth must include the relevant components in their workplan that is on file with DEED, along with a revised budget, where appropriate.

**IMPORTANT POINTS:**

* Young adults between the ages of 22 and 24 who are in post-secondary school at the time of enrollment are NOT eligible to be served under WIOA Young Adult program, since they are considered “in-school youth” and the law specifically caps ISY age eligibility at 21. They may, however, be eligible for the WIOA adult program.
* Unlike WIOA Adult or WIOA Dislocated Worker programs, ITAs are **NOT** required for WIOA Youth Participants. WDAs/youth service providers are encouraged to use training providers from Minnesota’s Eligible Training Provider List (ETPL) when providing training outside of an ITA but are NOT required to do so.

The use of an ITA for any eligible WIOA youth participant should be in accordance with the participant’s Individual Service Strategy (ISS). It may be used in instances where a primary focus of the ISS is determined to be the development of skills necessary to help connect the youth with a career pathway. The ITA is not intended to be an alternative to acquiring a high school diploma or GED.

The Local Workforce Development Board (LWDB) should establish policy regarding the structure and criteria governing the use of ITAs, if the WDA chooses to use ITAs with WIOA Youth participants. The local policy might include (but not be limited to):

* Requirements tying training to in-demand occupations;
* Providing training for occupations with established career pathways;
* Local caps on ITA expenditures and duration of training. Limits to ITAs may be established in different ways:

(1) There may be a limit for an individual participant based on needs and/or goals identified in the ISS, such as the participant’s occupational interests and the level of training needed to succeed in that goal; or

(2) The LWDB may establish a maximum amount of funding applicable to all ITAs, and/or limitations on what may be covered via program dollars through the ITA.

* Any other local policy-based ITA criteria approved by the Local Board.

The exact nature of the ITA and for whom it will be used is decided at the local level. The following issues are examples of the types of decisions that should be made by the WDA and included in the policy:

* Who will be an appropriate candidate for an ITA?
* Who will be required to sign off on an ITA?
* What will be the payment mechanism (e.g. vouchers, electronic fund transfer, consumer “smart cards”, or other methods)?
* What processes or procedures will be used to track ITA payments?
* Will the ITA be for a specific amount, time period or both?
* Will the ITA include anything other than tuition, books, fees and supplies (such as supportive services)?

Certain basic principles must be followed by ALL WDAs in establishing systems for the use of ITAs:

* ITAs can only be used for WIOA eligible participants.
* ITAs can only be used with WIOA-certified training programs. Training providers must be on the Eligible Training Provider List (ETPL). **Reminder: ITAs are NOT required under WIOA Youth to provide training services. Use of the ETPL when providing training outside an ITA is optional but encouraged.**
* A school must be willing to accept ITAs in order to be a WIOA-certified training program provider.
* An individual must be able to access data on how many dollars are in his/her ITA. (The mechanism for doing this is a local decision.)
* An ITA may include money for supportive services, but this is a local decision.
* An ITA must be part of an ISS that is agreed to by both the participant and counselor/case manager.
* An ITA must be used in conjunction with other applicable funding sources.

Expenditures and enrollment should also be tracked locally for older youth ITAs.  The ITA allows the WDA to more carefully monitor what is being spent on training and training related costs.

Information maintained in the case file and/or data recorded in Workforce One relating to ITAs may be subject to data validation requirements that are currently under development.

The Department of Labor 2018 Core Monitoring Guide reviews the provision of training services to program participants, including the use of ITAs. Local areas can expect the local ITA policy and practices to be part of regular program monitoring by state and/or federal monitors.

**ITAs in conjunction with Registered Apprenticeships or OJT’s**

The final rule highlights registered apprenticeship programs as a training service for both ITAs and as OJT. Registered apprenticeship programs are automatically eligible for the ETPL. Apprenticeship programs that are not registered are allowed to go through the eligible training provider (ETP) process if they want to be on the ETP list.

ITAs can be used to support placing participants in registered apprenticeship through:

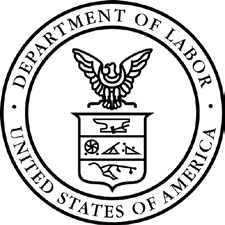
(1) Pre-apprenticeship training

(2) Training services provided under a registered apprenticeship program up to limit of ITA.

DEED monitors will review use of ITAs, including documentation in the ISS and tracking of funds used for ITAs during routine desk reviews and on-site monitoring.

For more information on the WIOA Certification Process and Minnesota’s Eligible Training Provider List (ETPL) visit: <https://mn.gov/deed/programs-services/dislocated-worker/wioa-adult/resources/>

[DEED Youth Website](http://mn.gov/deed/programs-services/office-youth-development/index.jsp)

**U.S. Department of Labor** Assistant Secretary for

Employment and Training Washington, D.C. 20210

June 14, 2024

The Honorable Tim Walz Governor of Minnesota 130 State Capitol

75 Rev. Dr. Martin Luther King, Jr. Boulevard St. Paul, MN 55155

Dear Governor Walz:

Thank you for your waiver request submission to the U.S. Department of Labor regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver requests were received April 5, 2024, as part of your recent WIOA State Plan submission. This letter provides the Employment and Training Administration’s (ETA) official response to your request and memorializes that Minnesota will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Minnesota and ETA. This action is taken under the Secretary of Labor’s authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8–10 of the Wagner-Peyser Act in WIOA Section 189(i).

Requested Waiver: Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for in-school youth (ISY).

ETA Response: ETA approves, for Program Year (PY) 2024 and PY 2025, the State’s request to waive the requirement limiting ITAs to only out-of-school youth (OSY), ages 16–24. In addition to these OSY, the State may use ITAs for ISY, ages 16–21. ETA reviewed Minnesota’s waiver request and plan and has determined that the requirements requested to be waived impede the ability of the State to implement its plan to improve the workforce development system. Approval of this waiver should not impede the State’s efforts to prioritize OSY, including outreach to the OSY population.

Requested Waiver: Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of local formula youth funds on OSY.

ETA Response: ETA approves for PY 2024 and PY 2025, which includes the entire time period for which states are authorized to spend each of those Program Year fund allotments, the State’s request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. Minnesota may lower the local youth funds expenditure requirement to 60 percent for OSY. ETA reviewed Minnesota’s waiver request and plan and has determined that the requirements requested to be waived impede the ability of State to implement its plan to improve the workforce development system. As a result of this waiver, ETA expects that the number of ISY served will increase, and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators.

The State must report its waiver outcomes and implementation of the approved waiver in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

José Javier Rodríguez

Enclosure

cc: Matt Varilek, Commissioner, Minnesota Department of Employment and Economic Development

Pam Gerassimides, ETA Regional Administrator – Region 5 Chicago

Malissa Dieterle, ETA Federal Project Officer