



# **CENTRAL OKLAHOMA**

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## **WORKFORCE INNOVATION BOARD**

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### **Individual Training Account (ITA) Policy**

Approved and Published: February 2023

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*The Central Oklahoma Workforce Innovation Board (COWIB) is the policy and guidance board for the Workforce Oklahoma system in Central Oklahoma. We are business leaders with a goal to establish a highly skilled, productive workforce in our 9-county area.*

*The Central Oklahoma Workforce Innovation Board (COWIB) complies with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, the basis of citizenship status or participation in a WIOA Title-1 financially assisted program or activity.*

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# CENTRAL OKLAHOMA WORKFORCE INNOVATION BOARD

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## Individual Training Account (ITA) Policy

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# COWIB Individual Training Account (ITA) Policy

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## Purpose

To provide guidance and establish the Central Oklahoma Workforce Innovation Board's policy for the Individual Training Account (ITA) in accordance with Workforce System Directives WSD# 80-2024, Adult and Dislocated Worker and WSD# 12-2024, WIOA Title I Youth Program.

## Authority

The authority for this policy is derived from the following:

- WIOA §134(F) and §134(G)(i)
- 20 C.F.R. Sec. 683.510
- WSD# 80-2024, Adult and Dislocated Worker Programs
- WSD# 12-2024, WIOA Title I Youth Program

## Background

The Workforce Innovation and Opportunity Act of 2014, in §134(F) establishes the requirement that “training services...shall be provided in a manner that maximizes consumer choice in the selection of an eligible provider of such services,” and further establishes in §134(c)(3)(F)(iii):

*INDIVIDUAL TRAINING ACCOUNTS. — An individual who seeks training services and who is eligible pursuant to subparagraph (A), may, in consultation with a career planner, select an eligible provider of training services from the list of providers described in clause (ii). Upon such selection, the one-stop operator involved shall, to the extent practicable, refer such individual to the eligible provider of training services, and arrange for payment for such services through an individual training account. that “training services shall be provided through the use of individual training accounts...and shall be provided to eligible individuals through the one-stop delivery system.”*

Per WIOA §134(c)(3)(G), the USE OF INDIVIDUAL TRAINING ACCOUNTS-

*IN GENERAL. —Except as provided in clause (ii), training services provided under this paragraph shall be provided through the use of individual training accounts in accordance with this paragraph, and shall be provided to eligible individuals through the one-stop delivery system...*

In addition, 20 C.F.R. §681.550 authorizes the use of ITAs for out-of-school youth participants ages 16 to 24 using WIOA youth funds when appropriate.

The definition of the term, “Individual Training Account” appears in 20 C.F.R. §680.300:

*Training services for eligible individuals are typically provided by training providers who receive payment for their services through an ITA. The ITA is a payment agreement established on behalf of a participant with a training provider. WIOA title I adult and dislocated workers purchase training services from State eligible training providers they select in consultation with the career*

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*planner, which includes discussion of program quality and performance information on the available eligible training providers. Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments also may be made incrementally, for example, through payment of a portion of the costs at different points in the training course....*

### Local Policy

#### Management of ITAs

As described above, Individual Training Accounts will be provided to eligible participants through the one-stop delivery system. In Central Oklahoma, ITAs will be managed by the Central Oklahoma Workforce Innovation Board in cooperation with:

- a. The COWIB's Service Provider (for the delivery of training services to Adult and Dislocated Worker participants); and
- b. For Out-of-School Youth, the entity / entities selected by the COWIB to deliver the services of the WIOA Youth Program.

#### Eligible Participants

Participants who are eligible to receive assistance through an ITA include:

- a. Eligible Adults;
- b. Eligible Dislocated Workers, including those funded by National Emergency Grant funds; and
- c. Out-of-School Youth

An ITA may be used only to support the qualified training costs of the individual named on the account. ITAs shall not be transferable. ITAs shall not be established for training that is fully funded with TAA program funds or other non-WIOA funds.

#### Funding of ITAs

The Central Oklahoma Workforce Innovation Board, acting as the fiscal agent for WIOA Title I funds in the Central Oklahoma area, will monitor payments to eligible training providers based on properly prepared Individual Training Accounts and other payment mechanisms (vouchers, etc.).

Generally speaking, the actual payments will be made by the COWIB Service Provider.

For Adults and Dislocated Workers, the COWIB, through its service provider, shall use funds that have been awarded to the COWIB for this purpose.

For Out-of-School Youth, the COWIB may use available funds as allowable and appropriate:

- For an Out-of-School Youth who is eligible to receive concurrent services as an Adult or Dislocated Worker, funds from the WIOA Adult program or Dislocated Worker program may be used to pay for the ITA as described in the WIOA Regulations at §680.300.

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- Alternatively, WIOA Youth Program funds may be used to finance the ITAs for OSY.

The COWIB's Service Provider will coordinate the use of ITAs for co-enrolled (Adult / Out-of-School Youth) participants so as to ensure that payments to training providers are not duplicated.

### Assessment, Advisement, and Individual Plan Development

Prior to approving an ITA for any eligible participant, the COWIB's service provider must ensure that a training plan has been established for each participant, consistent with State and local policies. At a minimum, the service provider must verify that each participant has received assessment, career planning/guidance, and an individual employment plan or individual service strategy prior to selecting a training program.

For Adults and Dislocated Workers, this requirement is described in WIOA Section 134(c)(3):

*(3) TRAINING SERVICES. —*

*(A) IN GENERAL. —*

- (i) ELIGIBILITY. —Except as provided in clause (ii), funds allocated to a local area for adults under paragraph (2)(A) or (3), as appropriate, of section 133(b), and funds allocated to the local area for dislocated workers under section 133(b)(2)(B), shall be used to provide training services to adults and dislocated workers, respectively—*
- (I) who, after an interview, evaluation, or assessment, and career planning, have been determined by a one-stop operator or one-stop partner, as appropriate, to—*
- (aa) be unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through the career services described in paragraph (2)(A)(xii);*
- (bb) be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and*
- (cc) have the skills and qualifications to successfully participate in the selected program of training services;*
- (II) who select programs of training services that are directly linked to the employment opportunities in the local area or the planning region, or in another area to which the adults or dislocated workers are willing to commute or relocate;*
- (III) who meet the requirements of subparagraph (B); and*
- (IV) who are determined to be eligible in accordance with the priority system in effect under subparagraph (E).*

For Adult participants, there must be clear evidence that the COWIB's Priority Guidelines have been

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followed.

For Out-of-School Youth, the participant must have an Individual Service Strategy meeting the requirements of the COWIB's Policy and Procedures on Youth Assessment and Individual Service Strategy (ISS).

For any participant who is referred to training – whether Adult, Dislocated Worker, or Youth, the assessment must show that the individual is in need of training services and has the skills and qualifications to successfully complete the selected program of training.

### Qualifications to Succeed in the Program of Training

As interpreted by COWIB, this means that at a minimum, the participant must meet the minimum entrance criteria established by the school / training provider for participation in the selected program of training services.

Additionally, the Service Provider, may establish other objective screening criteria that may reasonably be used to predict a participant's success in a program of training services. This may include the creation of certain prerequisites related to reading skills, math skills, educational credentials, and/or other criteria that can be measured by a standardized test or assessment.

Before establishing any additional screening process, the Service Provider must provide a written determination to the COWIB. The determination must describe:

- The program of training services;
- The additional objective screening criteria that will be used;
- How it will be determined, on an individual basis, whether a participant satisfies the additional screening criteria;
- An explanation of how the additional criteria are reasonable predictive of success in the training program; and
- An assurance that the screening process will be fairly and equally applied to all participants who seek an ITA in the identified program of training services.

### Licensed Occupations with Special Qualifications

With regard to an individual's "qualifications to succeed in the program," the career navigator must keep in mind that some occupational choices have state-regulated licensing and certification requirements. The client's choice of occupational skills training should be made with proper regard for the state employment regulations.

### Consultation with a Career Navigator

As noted above, the Service Provider must verify that each participant has received the benefit of assessment, advisement, and an individual employment plan or individual service strategy prior to selecting a program of training.

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In this regard, the role of the career navigator is essential. By evaluating the individual's interests, abilities, and aptitudes in comparison to the skill requirements of particular occupations, the career navigator can assist the participant in making a career choice that attainable and fulfilling.

### **Assuring a Fair and Equal Opportunity for Training**

Throughout the process of awarding ITAs, COWIB's WIOA Service Provider and One-Stop Partners must always be mindful of the COWIB's Equal Opportunity Policy.

The COWIB's policy is that all WIOA services shall be delivered in full compliance with all applicable laws including:

- Section 188 of the Workforce Innovation and Opportunity Act (WIOA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or participation in any program or activity that receives funds under Title I of WIOA;
- Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color and national origin;
- Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
- Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.

With regard to the provision of ITAs in a fair and impartial manner, there are two particular topics that deserve special consideration: Non-Traditional Occupations; and Opportunities for Clients with Criminal Records.

### **Non-Traditional Occupations**

Section 194 of the Workforce Innovation and Opportunity Act provides that all programs under Title I of WIOA – Adult, Youth, Dislocated Worker, etc. – shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities. In addition, the law states:

*"...The recipients of Federal funding for programs under this title shall make efforts to develop programs that contribute to occupational development, upward mobility, development of new careers, and opportunities for nontraditional employment."*

Section 3 of WIOA defines "nontraditional employment" as:

*(37) NONTRADITIONAL EMPLOYMENT. — The term "nontraditional employment" refers to occupations or fields of work, for which individuals from the gender involved comprise less*



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*than 25 percent of the individuals employed in each such occupation or field of work.*

COWIB has chosen to support upward mobility and opportunities for nontraditional employment by identifying several occupations that are nontraditional for women.

There is a special emphasis on nontraditional employment in the WIOA Youth program. For example, Section 129(c)(1) includes these statements:

(c) LOCAL ELEMENTS AND REQUIREMENTS. —

(1) PROGRAM DESIGN. —Funds allocated to a local area for eligible youth under section 128(b) shall be used to carry out, for eligible youth, programs that—

(A) provide an objective assessment of the academic levels, skill levels, and service needs of each participant, which assessment shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs)...

(B) develop service strategies for each participant that are directly linked to 1 or more of the indicators of performance described in section 116(b)(2)(A)(ii), and that shall identify career pathways that include education and employment goals (including, in appropriate circumstances, nontraditional employment)...

Regardless of a participant's gender, COWIB supports the provision of career guidance and labor market information that allows our clients to consider the full range of occupations for which they have the skills, qualifications, aptitude, etc., to be successful.

Prior to the completion of the IEP or ISS, every WIOA program participant should have the opportunity to review all career options for which they are suited, including nontraditional occupations.

### ***Employment and Training Opportunities for Clients with Criminal Records***

On April 25, 2012, the U. S. Equal Employment Opportunity Commission (EEOC) published enforcement guidance on Consideration of Arrest and Conviction Records in Employment Decisions Under Title VII of the Civil Rights Act of 1964. To address how the EEOC guidance regarding applicant exclusion based on criminal records was relevant to the existing nondiscrimination obligations for the public workforce system, on May 25th of that year, the Department of Labor published TEGl 31-11.

As an example of an “exclusion” based on a criminal record, the TEGl offers this hypothetical illustration:

*“...One-Stop Career Centers may be posting job announcements that categorically exclude people who have any kind of conviction or arrest, or screening out job seekers with criminal records by not referring them to employers who have stated that they will only accept applicants with ‘clean’ criminal records. Because of racial and ethnic disparities reflected in the criminal justice system, these policies or practices will likely have a disparate impact on certain protected*

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*groups, in violation of federal law.”*

With regard to job referrals and labor exchange services, the TEGL refers to guidance from the Equal Employment Opportunity Commission (EEOC) on the use of arrest and conviction records in employment decisions. The EEOC's guidance is included as an attachment to the TEGL.

With regard to Individual Training Accounts provided by local workforce development programs, the TEGL offers this reminder:

*“The WIA nondiscrimination regulations prohibit recipients from using ‘standards, procedures, criteria, or administrative methods’ that have the purpose or effect of subjecting individuals to discrimination on a prohibited ground due to the recipient’s administration of programs providing aid, benefits, services, training or facilities ‘in any manner.’”*

It follows that WIOA program activities, including the award of ITA's, should avoid the practice of categorically excluding people who have any kind of conviction or arrest.

COWIB interprets this guidance to mean that WIOA program staff may consider an individual's history of arrest or criminal conviction when providing career guidance and when developing an ISS or Individual Employment Plan that includes occupational skills training. Even so, it would be inappropriate to categorically exclude WIOA clients with a record of arrest or conviction from receiving an ITA. Any attempt to restrict or prohibit the training of clients with a record of arrest or conviction must be approached very cautiously.

### **Special Guidelines for Truck Driver Training**

Considering WIOA Section 134(c)(3)(A)(i)(I)(cc), the COWIB has developed some specific guidelines for determining whether truck driver training as appropriate for any given participant. In particular, we have recognized the following special qualifications that pertain specifically to truck driver training:

#### **Physical Exam and Drug Screen**

The Oklahoma Department of Public Safety has established pre-requisites for the issuance of a CDL that include certain physical requirements. An applicant for a CDL must be able to obtain a medical examiner's certificate (as described in the official Rules of the Department of Public Safety at 595:11-1-17).

Additionally, the U.S. Department of Transportation (Federal Motor Carrier Safety Administration) has established alcohol and drug testing rules that “...apply to every person and to all employers of such persons who operate a commercial motor vehicle in commerce in any state.” The regulations require testing for the following classes of substances: Marijuana, Cocaine, Opiates, Amphetamines and methamphetamines, and Phencyclidine (PCP).

Consequently, the COWIB's policy will be to disapprove any ITA if the participant has failed to successfully pass an appropriate physical examination and drug screen.

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### Driving Record

The labor market for truck drivers is very competitive, and employers generally require a clean Motor Vehicle Record – with no DUI's and no moving violations. (There may be exceptions to this general observation, depending on location, particular industry segment, etc.). The COWIB policy will be that any applicant who has a DUI conviction shall be considered unqualified for truck driver training. Also, any moving violation within the last 5 years shall be considered a disqualifying condition.

The only exception to this rule will be if the applicant is able to obtain a pre-hire letter from an employer who is willing to hire upon successful completion of training.

**NOTE: Pre-hire letters are generally indicative of an employer's intention to hire an individual – contingent on the individual's successful completion of training. In the event that an applicant for an ITA has any particular circumstances (felony record, etc.) that represent a potential barrier to employment, our WIOA service providers are authorized and encouraged to require the applicant to seek a pre-hire letter. In such instances, the pre-hire letter will become a part of the participant's record of assessment and career advisement.**

Both special qualifications listed above must be satisfied before an ITA may be approved for truck driver training.

Applicants who are found to lack the qualifications for truck driver training should be encouraged to identify another appropriate career goal and program of training in which the participant “can achieve success.”

In the event that an application for an Individual Training Account is denied for any reason, the applicant has the right to file a grievance with the WIOA service provider or with the COWIB (pursuant to Section 181(c) of the Workforce Innovation and Opportunity Act).

### Training in Demand Occupations

The COWIB's Service Provider will verify that all ITA's are established to support training services that are directly linked to the employment opportunities in the local area or the planning region, or in another area to which the adults or dislocated workers are willing to commute or relocate. (Reference: WIOA Section 134(c)(3)(A)(i)(II)).

Providing Information about the Demand Occupations List. The COWIB has published an In-Demand Occupations List which has been made available at: <https://www.cowib.org/about-us/policies-procedures/>. The Service Provider will establish procedures to assure that WIOA customers have access to the In-Demand Occupations List.

### List of Eligible Training Providers (ETPL)

COWIB ITAs will only be used for schools or institutions on the State Eligible Training Provider List. Eligible Training Providers are identified by the State of Oklahoma in cooperation with local workforce

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development boards. The Oklahoma Employment Security Commission has created an online “State List” of WIOA eligible training providers which is located by accessing the virtual case management system. This site is easily accessible at all Oklahoma Works Centers or from any computer with internet access.

Each Service Provider will establish procedures for making available the State List to its customers. Consistent with the “customer choice” principle of the Workforce Innovation and Opportunity Act, WIOA customers must be given access to the complete list of eligible training providers. Through consultation with the career navigator, including discussion of program quality and ETP performance information, the program participant is able to make an informed choice when selecting a training provider and program.

After consultation and joint agreement on the program and training provider, the career navigator and the participant should complete and sign an Individual Training Account Agreement form. (ITA Agreement Attachment 1).

### Coordination of Training Funds (COTF)

The Coordination of Training Funds (COTF) form (COTF Attachment 2), is a fundamental tool for assuring compliance with WIOA Section 134(c)(3)(B)(i). It provides a standard method for determining the unmet needs of WIOA-supported students, and is helpful in establishing the cash value of WIOA assistance that may be given to a participant. The form must include all assistance provided, with the exception of loans and VA benefits for education and training. The completed COTF (along with any institution provided documentation of the training period covered, the cost of training attendance broken down by cost category, and coordination of training funds), must be uploaded to the virtual case management system. A new COTF form is required annually at a minimum.

According to 20 C.F.R. §680.230, WIOA funding for training is limited to participants who:

1. *Are unable to obtain grant assistance from other sources to pay the costs of their training.* (Remember that Veterans Administration Educational Benefits and Loans are excluded)
2. *Require assistance beyond available grant assistance from other sources to pay the costs of training.* Career Navigators will document WIOA and other funding sources, (except loans), available to WIOA participants on the COTF form provided in WSD# 80-2024. The amount of WIOA training and supportive service funds available will not exceed the total cost of attendance for the corresponding period of training, as indicated on this form by a financial aid officer or equivalent employee of the training institution. WIOA staff may make revisions or additions to the information on the COTF that has been provided by the financial aid office in the event that cost of living or other allowable training expenses are not documented or miscalculations have been made. A detailed program note documenting the reason for the revision or addition should be entered in the virtual case management system. Career Navigators will ensure that local ITA and supportive limits are not exceeded.
  - a. If the COTF indicates that the training provider is not Pell-eligible, supportive services may

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- be authorized on a case-by-case basis by the WIOA service provider in excess of the unmet financial need indicated on the COTF. This would allow participation in WIOA occupational skills training. The amount authorized for supportive services for WIOA participants – Adult, Dislocated Worker, Youth or National Emergency Grant – in this circumstance will not exceed \$1,000 per Training Voucher or the amount of the unmet need whichever is less. - -
- NOTE: Training related expenses for WIOA eligible adults, dislocated workers or out-of-school youth that may be covered by an Individual Training Account do not count against the supportive services limit for each registered Participant. ITA related training expenses may include, but are not limited to: assistance with the purchase of tools required for a specific course; current school admission fees; computer and lab fees; books, and supplies.
- b. WIOA funding may only be applied as supplemental funding and must be coordinated with other potential funding sources. The COTF will be used to document funding coordination and verification that WIOA funds were used as supplemental funding. The COTF is used to determine that all the participant's training-related financial assistance needs are being met. The Career Navigator utilizes the information on the COTF to accurately record the participant's needs and mix of funding assistance on the ITA.
  - c. The participant will authorize the release of his/her financial aid information by the training institution to WIOA staff or an ITA will not be awarded.
  - d. The completion of Section III of the COTF by the financial aid office and the completion of Section IV by the WIOA service provider will ensure that WIOA funds are used in addition to, not instead of, funds otherwise available and are coordinated with those funds.
  - e. Although student loans are one of the forms of financial aid that may be available to participants, WIOA participants are not required or encouraged to incur personal debt as a condition of participation in an ITA. Should the participant choose to incur personal debt, acknowledgement that they have been advised by their Career Navigator regarding the responsibilities associated with this indebtedness will be recorded in the participant's file.
  - f. WIOA Section 134(c)(3)(B)(ii) permits a WIOA participant to enroll in an eligible training program with WIOA funds while an application for Pell Grant funds is pending. However, pursuant to the WIOA Regulations at § 680.230, the WIOA service provider must make prior arrangements with the eligible training provider and the WIOA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the Service Provider the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any education fees the training provider charges to attend training. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses. WIOA service providers are responsible for ensuring duplicate payments for training program costs are not made with WIOA funds.
  - g. A new COTF is required annually at a minimum and all semesters included in the billing cycle must be covered on the COTF.
  - h. Participants will apply for and establish eligibility for Higher Education Act Title IV funds and

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other forms of financial aid before an ITA is awarded. As a last resort, participants will be made aware of the online applications process at [www.FAFSA.ed.gov](http://www.FAFSA.ed.gov) or they may be provided a paper application form if they prefer. Any needed assistance in completing and submitting the forms will be provided by the Career Navigator.

The development of an ITA is not necessary when the participants are TAA funded.

NOTE: Guidance from OESC now permits the use of WIOA funds to pay for the cost of training for individuals who have a Federal Student Loan in default status. Local workforce staff must address the barrier caused by defaulting on their student loans, provide information on how to get out of default status, and address steps taken in the IEP/ISS.

### ITA Limits

20 C.F.R. §680.310 provides that the duration and amount of ITAs may be limited by local board policy. Consistent with this guidance, COWIB has established the following overall limits:

#### General Maximum Limits on ITA Amount / Duration:

##### Limit on the Duration of the ITA

Each ITA shall be time-limited. The ITA may be used to pay for training that does not exceed 24 months (or 104 weeks) of training time, measured from the date of the first week of training to the date of the last week of training. "Training time," in this sense, does not include regularly scheduled breaks in the participant's training schedule – for example: Summer Break, Fall Break, Spring Break.

##### Limit on the Amount of the ITA – Including Lifetime Max

A client may receive more than one ITA, but the amount of expenses paid through all ITAs shall not exceed the lifetime maximum of \$10,000 for any student.

#### Lower Maximums for Shorter Training

Within the overall maximum amount / duration limits described in paragraph (a), above, and consistent with the guidance provided in § 680.310, a lower limit will generally apply to any program of training services that is designed to be completed in 12 months (or 52 weeks) or less of training time. For these shorter training programs, the amount of expenses paid through an ITA shall generally not exceed \$5,000 for any student.

#### Special Exceptions Depending on the Occupation

COWIB's Chief Executive Officer may establish a range of training duration / cost maximums for specific types of occupational skills training, based on one or more of the following considerations:

- The vocational preparation time required for the specific occupation.
- Whether or not the training is related to a "STEM" occupation – that is, an occupation in the field of Science, Technology, Engineering, or Mathematics (as defined by the O\*Net

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Occupational Information Network).

- The degree to which the specific occupational area is associated with Targeted Industries in the Central Oklahoma area.

Any special exceptions to the general limits described in the paragraphs above shall be documented by a memorandum published as an attachment to this policy. The memorandum shall specify the maximum Duration / Amount limits that will apply to each specific occupational area.

When any such special exceptions to the Duration / Amount limits are defined, they shall be fairly and equally applied to:

- All programs of training services that are approved for the specific occupation; and
- All participants who are found to have the skills and qualifications to succeed in the program.

### Payment of Necessary and Reasonable Costs

Within the maximum amounts and range limits established above, COWIB, in cooperation with its Service Provider, shall establish procedures for making necessary and reasonable payments to cover the actual cost of training for each participant.

Pursuant to § 680.300 of the WIOA Final Regulations, payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments also may be made incrementally, for example, through payment of a portion of the costs at different points in the training course.

To protect program funds, prudent and reasonable procedures shall be maintained for closing an ITA whenever a customer fails to maintain satisfactory progress in his / her program of training.

### ITA Modifications / Exceptions

Any changes to an ITA must be made using an ITA Modification Form. (Attachment 1) Exceptions to the limitations in this policy may be made in individual cases under the following circumstances:

- Individual Hardship – unanticipated life circumstances that have a negative effect on the ability of the participant to complete his/her program of training within the planned timeframe; or
- Other Circumstances Beyond the Control of the Participant – For example, unanticipated costs or extension of time required to complete the approved program of training.

In the event of an Individual Hardship, an ITA may be modified to exceed the limits established.

Examples of “unanticipated life circumstances”, or “other circumstances beyond the control of the participant” that may qualify for an Individual Hardship exception include:

- A long-term illness suffered by the participant or a family member;
- Frequent minor illnesses requiring the participant to miss more than one session of training;
- A problem with alcohol or drugs that interferes with attendance in the training program;



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- Incarceration of the participant or a family member;
- Difficulty finding adequate housing;
- Difficulty recovering from a crime;
- Difficulty caused by sexual, emotional, or physical abuse;
- An unexpected extension of the duration of the training program by the training provider;
- An unanticipated increase in the cost of tuition, fees, or the cost of books, etc.;
- An unexpected cancellation or closing or delay of a required class, session, internship opportunity, or other required element of the training program;

When an exception has been granted, the amount of the individual's ITA may be increased by a necessary and reasonable amount not to exceed 50% of the original value of the ITA (up to an additional \$5,000). The duration of the individual's ITA may be extended by a length of time not to exceed 50% of the original training plan (i.e., up to an additional 12 months).

### Fairness

COWIB will make every effort to serve individual participants in a manner that is fair and impartial. The COWIB and its service providers recognize our responsibility to deliver our services in a nondiscriminatory fashion. In establishing individual participant limits relative to ITA's, we will assure that all participants are treated equitably – without regard to the individual's race, color, religion, sex, national origin, age, disability, political affiliation or belief. Furthermore, we will not discriminate on the basis of the participant's citizenship or status as a lawfully admitted immigrant authorized to work in the United States. And, we will offer equitable services to all customers regardless of the individual's participation in any WIOA Title I-financially assisted program or activity.

### Limited Exceptions to the use of ITAs

Consistent with the WIOA law and regulations, training services authorized under this paragraph may be provided pursuant to a contract for services in lieu of an ITA if one of the following exceptions applies:

1. If the services provided are on-the-job training, customized training, incumbent worker training, or transitional employment;
2. If the COWIB determines there is a community-based or other private organization with a training program that serves special participant populations with demonstrated effectiveness;
3. If the COWIB has determined that it would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors occupations, provided that the contract does not limit consumer choice.
4. If the COWIB enters into a pay-for-performance contract consistent with 20 C.F.R. §683.510
5. When the participant is an Out-of-School Youth and the service provider chooses not to use an ITA mechanism to pay for occupational skills training.
6. When the participant is an In-School Youth (ISY).



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### In-School and Out of School Youth Training Provider Procurement

In accordance with WSD# 22-2024, training that is not provided through the use of an ITA for an Out of School Youth must be competitively procured. In School Youth only have the option of procured training. Utilizing the Youth Training Provider Procurement Form, (Attachment 3), the Career Navigator should obtain and document quotes for the participant's selected training from 3 providers of the same type of training. The most cost-effective bid should be selected unless there is a compelling reason for choosing a particular Training Provider, i.e. Training Provider "A" is \$300.00 less than Training Provider "B", but is 40 minutes away by car. Training Provider B is a 15-minute walk from the participant's residence. In this case, the Career Navigator could allow training with Training Provider B and provide appropriate justification in the participant's case notes.

### Consumer Choice

Training services, whether accessed by establishment of ITA's and the providing of vouchers or contracted arrangements, must be provided in a manner which maximizes informed customer choice in selecting an eligible training services provider in accordance with the goals and objectives outlined in the client's Individual Employment Plan (IEP) or Individual Service Strategy (ISS).

With the following exceptions, the COWIB's Service Providers must make available to customers the complete list of eligible training providers:

#### Exception #1: Out of State Training

Customers may not use an ITA to access training at an out-of-state training provider location without prior written approval by the COWIB's CEO. (This is applicable only to instances where a student must travel to the training location.)

#### Exception #2: Out of Area Training

Service Providers may limit the customer's choice to those Eligible Training Providers which are located within a reasonable distance of the Central Oklahoma workforce development area. This exception is made in order to manage the extra costs of coordination and oversight that are often attendant to training services offered outside of the Central Oklahoma area. The COWIB's Chief Executive Officer will establish parameters with respect to training offered within the State of Oklahoma but outside of the Central Oklahoma workforce development area.

#### Exception #3: Customer's Skills and Ability

WIOA training funds may be used to support the training costs of an eligible participant only after a determination has been made affirming that the participant has the skills and ability to successfully participate in the selected program of training services. The determination must be based on an individual assessment that is compliant with the COWIB Policy on Assessment and IEP's (or, for Youth, the COWIB's Policy on Youth Assessment and Individual Service Strategy (ISS)). Therefore, the customer's choice of training providers may be restricted to those programs for which the participant

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has the necessary skills and ability to succeed.

With regard to Exception 3, the COWIB acknowledges § 680.300 of the WIOA Final Regulations, which describes how Individual Training Accounts are designed to enable eligible WIOA participants to

*“...purchase training services from State eligible training providers they select in consultation with the career planner...”.*

The consultative role of the career planner is a central consideration in the COWIB’s resolve to provide access to training services for eligible participants in a manner which maximizes informed customer choice.

The COWIB interprets § 680.300 to mean that the individual participant has the authority to select the eligible training provider that s/he prefers, provided that other requirements of this policy have been satisfied. In particular:

- The participant must meet the general eligibility / priority requirements for the establishment of an Individual Training Account.
- The participant must have participated in an assessment and evaluation process, culminating with the development of an IEP or ISS.
- The training program must be directly linked to the employment opportunities in the local area or the planning region, or in another area to which the participant is willing to commute or relocate.
- The participant must have received the benefit of advice, consultation and guidance from a WIOA career planner.
- The participant’s choice of training program must not violate any of the policy exceptions described above.

If each of these requirements has been satisfied, then the participant shall have the option of choosing the eligible training provider that s/he prefers.

### Payments

In the Central Oklahoma area, payments to eligible training providers will be made through a WIOA service provider. In general, payments will be made according to the following sequence of steps:

1. **Creation of an approved Individual Training Account.** The ITA will establish the maximum amount of funds which may be paid to the eligible training provider on behalf of the individual participant. The amount will reflect the total expected costs (tuition, fees, books, etc.) that will be paid through the ITA mechanism during the training period.
2. **Creation of approved Training Voucher.** With limited exceptions, incremental payments will be made to the eligible training provider at discrete payment points in the program of training (e.g., on a semester basis). For each payment, a Training Voucher will be created. This process will serve to verify that the individual participant is prepared to proceed with training. It will also

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serve as an advance notice to the accounting office of the Service Provider / Youth Provider that funds should be properly reserved for a payment to the training provider.

3. **Receipt of Invoice from the Training Provider.** Upon receiving a properly-prepared invoice from an eligible training provider, a payment will be made according to established procedures.

### Written Procedures

COWIB's Service Provider is authorized to establish written procedures for endorsing and facilitating access to training services. The procedures will describe:

- The method that will be used for the disbursement of funds to eligible training providers.
- How ITA expenditures will be documented.
- A process for tracking WIOA Title I expenditures paying for the individual's training, training-related, and supportive service cost.
- A process for tracking total local area ITA obligations to ensure that the COWIB's budget is not exceeded.
- A process to ensure training-related costs such as books, uniforms, tools, etc., not paid to the eligible training provider can be provided as a supportive service in accordance with the COWIB's supportive service policy and procurement policy.

### Documentation

The Service Provider will include a process to collect and maintain required documentation.

Documentation elements include:

- A copy of the voucher, purchase order, invoice, source documentation, receipts, etc. that will support the payment mechanism.
- A tracking document (e.g., spreadsheet, report, etc.) to ensure local established funding limits have not been exceeded.
- A tracking document to ensure that training, training-related, and supportive service dollars do not exceed the unmet financial need.

### Subsequent ITAs

The COWIB policy shall be to promote and support lifelong learning – including occupational skills training through the establishment of a subsequent ITA (when eligibility criteria and priority considerations are met). The rules for subsequent ITAs follow:

- When the new ITA will not put the participant over the \$10,000 lifetime maximum allowable limit established by COWIB.
- When a former WIA or WIOA program participant applies for new program services and is determined to be an eligible dislocated worker, a new ITA may be issued upon completion of the usual enrollment / assessment / plan development processes described in COWIB policy. The new ITA shall be developed using the regular procedures described in this policy.
- When a former WIOA or WIA program participant applies for new program services and is

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determined to be an eligible Adult in need of additional training services, a new ITA may be issued upon completion of the usual processes described in COWIB policy (including compliance with the COWIB's Priority of Service policy). The new ITA shall be developed using the regular procedures described in this policy.

- Section 188(a)(4) of the Workforce Innovation and Opportunity Act states:  
**“(4) PROHIBITION ON DISCRIMINATION ON BASIS OF PARTICIPANT STATUS. — No person may discriminate against an individual who is a participant in a program or activity that receives funds under this title, with respect to the terms and conditions affecting, or rights provided to, the individual, solely because of the status of the individual as a participant.”**

COWIB interprets this prohibition to include discrimination against former participants as well as current participants. Therefore, every applicant for an Individual Training Account shall be given an equal opportunity to receive an ITA (consistent with federal, state, and local policy) – regardless of any previous assistance they may have received.

### Required Support Documentation

The following documentation must be uploaded to the virtual case management system along with the ITA:

- The virtual case management system Printout of Eligible Training Provider / Program page
- Current COWIB Demand Occupation List or Industry Sector List
- ONet page showing industries associated with occupation (If using Industry Sector List instead of Demand List)
- Completed COTF (make sure everything is filled out correctly and marked)
- Document with Total Cost of Program (must have beginning and end date)
- Program description from training provider

The following documentation must be uploaded to the virtual case management system along with the TV:

- Proof of Enrollment (can use the billing statement if all applicable information is on it)
- Completed COTF
- Billing Statement (can be many different forms, not all schools give the actual billing statement)
- Book Estimates (if necessary)
- Transcript / Grades (if applicable)
- Degree plan with current and past courses taken (required for each TV request)

### Equal Opportunity and Nondiscrimination Statement

All Recipients, and Sub-recipients / Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or

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belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

### **Addenda / Revisions**

The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal guidance is issued.

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## **COWIB Individual Training Account Agreement**

- ITA Form;
- ITA Modification Request Form.

These forms are presented as examples of allowable forms that may be used to implement the Individual Training Account Policy.

The COWIB, in coordination with its payment agent (WIOA Service Provider), will develop specific forms for the purpose of administering payments based on each customer's approved ITA.

Each properly completed ITA Form and Training Enrollment Agreement must carry the original signature of the WIOA participant as well as the original signature of the career planner or Workforce Specialist who helped the customer complete the documents. The ITA will establish the maximum amount of funds which may be paid to the eligible training provider on behalf of the individual participant.

### Individual Training Account

Participant: \_\_\_\_\_ ITA Number: \_\_\_\_\_  
 Participant ID: \_\_\_\_\_  
 ITA Start: \_\_\_\_\_ ITA End: \_\_\_\_\_  
 Amount of ITA: \_\_\_\_\_  
 Demand Occupation #: \_\_\_\_\_ Funding: \_\_\_\_\_  
 Training Provider: \_\_\_\_\_  
 Training Program: \_\_\_\_\_

#### Acknowledgement & Agreement

- The amount of my ITA has been awarded based on individual factors including cost of attendance, coordination of other funding sources, and needs identified in my IEP.
- ITA funding may be used to assist with tuition and fees as well as books, uniforms, tools, equipment, or supplies required for training/degree plan.
- This ITA is limited to the amount and the scheduled start and end date stated above.
- It is my responsibility to budget and track my ITA expenditures to ensure that the funds available to me are not depleted prior to completion of training. I will coordinate with my career navigator and verify my ITA balance as necessary.
- I understand that I must meet or exceed attendance and academic requirements of the school/training provider.
- I understand that I am not required to access student loans or incur personal debt as a condition of participation. However, if I chose to do so, I understand the responsibilities associated with such indebtedness, including loan repayment. My career navigator has counseled me in regard to this issue.
- Continued participation is subject to continued availability of funding by the department of labor.
- I agree to monthly contact with my career navigator to discuss my training progress and any other issues, whether academic, personal, or financial, that may affect the successful completion of my training.
- I will immediately inform my career navigator of changes of name, address, phone number, or back-up contact information.
- Prior to the beginning of each new semester I will schedule an appointment with my career navigator to complete a voucher for the upcoming semester. I agree to provide any documentation necessary for completion of the voucher, which may include class schedule, enrollment sheet, grade report from previous semester, and financial aid award letter.
- In the event that I drop or add a class, I will notify my career navigator immediately.
- Upon completion of my training, I agree to provide my career navigator with information concerning my employment and copies of any diplomas, credentials, or licenses earned.

**I have read this document and hereby understand and agree to comply with the terms herein described. I am receiving a copy of this agreement for my records.**

\_\_\_\_\_  
**Participant Signature** \_\_\_\_\_  
**Date**

**I have established this ITA and reviewed the terms of this agreement with the participant.**

\_\_\_\_\_  
**Career Navigator Signature** \_\_\_\_\_  
**Date**

#### APPROVAL OF PAYMENT AGENT

\_\_\_\_\_  
**Signature** \_\_\_\_\_  
**Date**

### ITA Modification

Participant: \_\_\_\_\_ ITA Number: \_\_\_\_\_

PID: \_\_\_\_\_

ITA Start: \_\_\_\_\_ ITA End: \_\_\_\_\_

ITA Original Amount: \_\_\_\_\_ Modified Amount: \_\_\_\_\_

Demand Occupation #: \_\_\_\_\_ Funding: \_\_\_\_\_

Training Provider: \_\_\_\_\_

Training Program: \_\_\_\_\_

### Modification & Explanation

**Items to be Modified:**

**Reason for Modification:**

I certify this request for ITA Modification

\_\_\_\_\_  
Career Navigator Signature

\_\_\_\_\_  
Date

### APPROVAL OF PAYMENT AGENT

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



## ITA Modification Form Instructions

Under some circumstances, it is permissible to modify a student's ITA in order to:

- Define a new Program of Training;
- Select a new Training Provider;
- Amend the original Training Period; and/or
- Revise the ITA Amount

The ITA Modification Request Form should be used when it is necessary to make a change for any of the reasons stated above. The request must be submitted by the Participant (student) and his/her Career Coach, and should include an explanation and any supporting documentation. Original signatures must be included on the form. Ensure that the request & reasoning is included in the IEP/ISS and case notes.

Approval or rejection of the request will be determined according to the guidelines given in this policy. Consideration will be given to the amount and duration limits as defined in the policy – as well as any exceptional circumstances that may be allowable.

**A Note About Changes in the Program of Training.** As an integral part of the ITA creation process, we require each customer to carefully define his / her training choice through a process of comprehensive assessment and IEP development. Students are expected to give their best effort to the completion of the plan of training that they have agreed to. Even so, we recognize that – from time to time – there will be students who have a need to change their career goal and/or training objective. In these cases, an ITA Modification Request may be considered. Generally speaking, an ITA Modification Request will be approved if each of the following conditions is satisfied:

- The overall amount of the training assistance to be provided – including any amounts previously provided under the original ITA -- will not exceed the dollar amount limits as stated in this policy;
  - The overall ITA duration limits will not be exceeded; and
  - The student and his/her Career Coach can demonstrate how the new training plan can reasonably be completed with the limited time and assistance that is allowed by this policy.
1. MODIFICATION NUMBER – ENTER THE NUMBER OF THE MODIFICATION. 1,2, ETC.
  2. PARTICIPANT: ENTER THE NAME OF THE PARTICIPANT
  3. PID: ENTER THE PARTICIPANT ID NUMBER ASSOCIATED WITH THE PARTICIPANT'S RECORD IN THE VIRTUAL CASE MANAGEMENT SYSTEM
  4. ITA START DATE: ENTER THE EFFECTIVE DATE OF THE MODIFICATION
  5. ITA END DATE: ENTER THE DATE THAT THE ITA WILL END
  6. ITA ORIGINAL AMOUNT: ENTER THE DOLLAR AMOUNT LISTED ON THE ORIGINAL ITA
  7. MODIFIED AMOUNT: ENTER THE REQUESTED TOTAL DOLLAR AMOUNT. IF THE DOLLAR AMOUNT IS NOT BEING MODIFIED MARK "N/A"
  8. DEMAND OCCUPATION: ENTER THE PARTICIPANT'S CHOSEN DEMAND OCCUPATION NUMBER
  9. TRAINING PROVIDER: ENTER THE NAME OF THE ELIGIBLE TRAINING PROVIDER
  10. TRAINING PROGRAM: ENTER THE COURSE OF STUDY OR TRAINING
  11. ITEMS TO BE MODIFIED: IDENTIFY EACH OF THE AREAS BEING MODIFIED AND THE DOLLAR AMOUNT TO BE MODIFIED. ALL DECREASES SHALL BE IDENTIFIED AS FOLLOWS: <\$0.00>. A MODIFICATION IS NOT REQUIRED IF THE COST OF BOOKS, EQUIPMENT/TOOLS, UNIFORMS AND OTHER COSTS ARE LOWER THAN THE MAXIMUM ESTIMATE WHICH WAS STATED ON THE TRAINING VOUCHER FORM.
  12. REASON FOR MODIFICATION: IDENTIFY THE REASON OR NEED FOR A MODIFICATION OF THE "INDIVIDUAL TRAINING VOUCHER". BE SPECIFIC, AND ATTACH ANY SUPPORTING DOCUMENTATION. (ALL MODIFICATIONS FOR TRAINING COST INCREASES MUST HAVE SUPPORTING DOCUMENTATION ATTACHED.)
  13. APPROVAL: THE MODIFICATION IS NOT VALID UNTIL IT HAS BEEN SIGNED BY AN AUTHORIZED REPRESENTATIVE OF THE WIOA SERVICE PROVIDER.



### Youth Training Provider Procurement Form

PARTICIPANT INFORMATION		
APPLICANT'S NAME: _____ <div style="display: flex; justify-content: space-around; width: 100%; font-size: small;"> <span>LAST</span> <span>FIRST</span> <span>MI</span> </div>		
PARTICIPANT ID: _____ APPLICATION DATE: _____		

TRAINING PROVIDER #1		TRAINING LOCATION ADDRESS AND PHONE NUMBER	
COURSE OF TRAINING	TOTAL HOURS	TOTAL TUITION AND FEES	
SOURCE OF INFORMATION (CHOOSE ONE)			
<input type="checkbox"/> CATALOG	<input type="checkbox"/> WEB PAGE PRINT- OUT (ATTACH)	<input type="checkbox"/> TELEPHONE QUOTE (ATTACH TELEPHONE VERIFICATION FORM)	
TRAINING PROVIDER #2		TRAINING LOCATION ADDRESS AND PHONE NUMBER	
COURSE OF TRAINING	TOTAL HOURS	TOTAL TUITION AND FEES	
SOURCE OF INFORMATION (CHOOSE ONE)			
<input type="checkbox"/> CATALOG	<input type="checkbox"/> WEB PAGE PRINT- OUT (ATTACH)	<input type="checkbox"/> TELEPHONE QUOTE (ATTACH TELEPHONE VERIFICATION FORM)	
TRAINING PROVIDER #3		TRAINING LOCATION ADDRESS AND PHONE NUMBER	
COURSE OF TRAINING	TOTAL HOURS	TOTAL TUITION AND FEES	
SOURCE OF INFORMATION (CHOOSE ONE)			
<input type="checkbox"/> CATALOG	<input type="checkbox"/> WEB PAGE PRINT- OUT (ATTACH)	<input type="checkbox"/> TELEPHONE QUOTE (ATTACH TELEPHONE VERIFICATION FORM)	

CERTIFICATION	
I CERTIFY THAT THE INFORMATION RECORDED ON THIS FORM IS ACCURATE AND WAS OBTAINED AS INDICATED BY THE SIGNATURE AND DATE BELOW.	
_____ CASE MANAGER SIGNATURE	_____ DATE