

Implementation of Individual Training Account Policies Under the Workforce Investment Act:

Early Information from Local Areas

Nisha Patel and Steve Savner

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-PRELIMINARY REPORT-

Center for Law and Social Policy
CLASP

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EXECUTIVE SUMMARY

The Workforce Investment Act of 1998 (WIA), which replaced the Job Training Partnership Act, is intended to reform the nation's workforce development system and devolves many policy decisions to the state and local levels. One of the major changes under the new system is that WIA-funded training services must generally be paid for through vouchers called Individual Training Accounts or ITAs. Because many of the decisions about eligibility and priority for training services are left to local workforce investment areas, policies have the potential to vary widely by locality. Local areas are currently at various stages of policy development and implementation. This preliminary report is the first stage of an on-going effort by CLASP to monitor implementation of ITAs. The report provides an overview of the requirements of the law related to training services and early examples of ITA policies that have been developed in local workforce investment areas. The paper examines how local areas have chosen to make policy determinations in three areas: eligibility for training services, priority for training services, and limitations on ITAs. In preparing this report we reviewed the most current local WIA plans and ITA policies available to us from 76 local workforce investment areas as of February 2001.

ELIGIBILITY FOR TRAINING SERVICES

In many local areas it appears that caseworkers will play an important role in determining eligibility for ITAs and will have significant discretion in doing so. Most local plans simply state the federal statutory requirement that training services will be provided after interview, evaluation, assessment and/or case management. However, some local policy documents provide additional details about the process that will be entailed in gaining access to and approval for an ITA.

For example, the **Atlanta** Regional Workforce Board's sample ITA policy for its five local WIBs suggests the following additional requirements, which focus upon the characteristics of the training:

- Training must result in a self-sufficiency wage without the aid of public assistance
- Training must be at least 12-quarter hours per week to accommodate Unemployment Insurance requirements
- Training must generally be within a reasonable commute of the local area

- ITA policies will apply to Pell/HOPE funds
- ITAs may be used for training-related expenses

The city of **Baltimore**'s policy appears to require substantial work by the individual attempting access training. Individuals are required to complete the following steps in completing applications for training:

- Attend an in-depth ITA orientation workshop
- Receive an application packet and justify that the chosen career has high growth projections
- Research the career choice and compare training providers
- Conduct interviews with providers, graduates, and persons working in field

Applications with an 80 percent or higher rating are then approved for training.

PRIORITY FOR TRAINING SERVICES

Many local plans merely restate the federal requirement that if it is determined that funds are limited, priority for training services will be given to low-income individuals and public assistance recipients. However, some local policies also specify criteria for applying priorities.

For example, the policy in **Montgomery County**, Maryland (in the greater Washington, D.C. area) utilizes a "most in need-most likely to benefit approach" which appears to focus upon barriers of individuals attempting to access training.

Most in need criteria include:

- Lack of a high school diploma
- Disabilities
- Multiple job losses in the past year
- Being age 40 or older
- Limited English proficiency

Most likely to benefit criteria include:

- Being identified for early intervention
- Being likely to benefit from "value added" training that is brief, readily available and cost effective

The city of **Philadelphia**'s policy focuses on income levels and establishes that individuals will receive priority for training services in the following order:

- Those receiving TANF or other supplemental public supports
- Those who fall below the Lower Living Standard Income Level (\$29,390 for a family of four in 2000)

- Those who earn less than 75 percent of the Philadelphia Self-Sufficiency Standard
- Those who earn 76 to 99 percent of the Philadelphia Self-Sufficiency Standard

LIMITATIONS ON ITAS

While both state and local boards have the authority to set limitations on the amounts and durations of ITAs, most states have left decisions about ITA limitations to local boards. Of the 76 local areas from which we received plans and policy documents, only 25 provided specific information on the ranges and limitations on ITAs. The caps on dollar amounts established by local WIBs from which we received information range from \$1,000 to \$10,000, with some boards setting different caps for different types of training. Maximum durations established by the WIBs range from six months to two years and also often depend upon the type of training.

FUTURE MONITORING

Although at this early stage there do not appear to be any clear trends in the way local areas have chosen to structure ITA policies, we expect to see further advancements in the both the development and implementation of ITA policies in the coming months. As local areas begin establishing ITAs and as performance measurement data becomes available, our understanding of the impact of ITAs on low-income individuals' access to training services should be enhanced.

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INTRODUCTION

The Workforce Investment Act of 1998 (WIA), which replaced the Job Training Partnership Act, is intended to reform the nation's workforce development system and devolves many policy decisions to the state and local levels. One of the major changes under the new system is that WIA-funded training services must generally be paid for through vouchers called Individual Training Accounts or ITAs.¹ Because many of the decisions about service delivery and eligibility and priority for training services are left to local workforce investment areas,² policies have the potential to vary widely by locality. Local areas are currently at various stages of policy development and implementation. While the statute initially required that WIA be implemented by July 1, 2000, guidance later issued by the Department of Labor effectively gave states an additional year to complete implementation.³ Therefore, we should expect to see further ITA policy development and implementation in local areas by July 1, 2001. This preliminary report is the first stage of an on-going effort by CLASP to monitor implementation of ITAs. The report provides an overview of the requirements of the law related to training services and early examples of ITA policies that have been developed in local workforce investment areas.

In preparing this report we sought policy documents and information from the 50 most populous urban areas in the country.⁴ In addition, we received all of the local WIA plans from New Jersey and Michigan, as well as information from several other metropolitan areas.⁵ We

¹ There are three exceptions when contracts for training services may be used instead of ITAs: When services provided are on-the-job training or customized training; when the local board determines that there are an insufficient number of eligible providers in the local area to accomplish the purpose of a system of ITAs; and when the local board determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve special low-income participant populations that face multiple barriers to employment, including individuals with substantial language or cultural barriers, offenders, homeless individuals, and other hard-to-serve populations as defined by the Governor (20 CFR §663.430(a)-(b)).

² Governors designate local workforce investment areas within each state.

³ Training and Employment Guidance Letter No. 15-99 (June 13, 2000). U.S. Department of Labor, Employment and Training Administration.

⁴ Source: U.S. Census Bureau. *Population of the 100 Largest Urban Places: 1990*. This represents most current data available at the time the information for this report was gathered.

⁵ We would like to thank the individuals in each of the local workforce investment areas who provided much of the information included in this report. In addition, we would like to thank Legal Services of New Jersey and the Michigan Legal for Human Services for providing local plans from New Jersey and Michigan. We would especially like to thank Steve Wamhoff for his assistance in obtaining and reviewing information from local areas.

reviewed the most current local WIA plans and ITA policies available to us as of February 2001. For a complete listing of local areas contacted and documents reviewed, see Appendix B.

Section I of this report provides an overview of the policy issues that local areas must address in implementing Individual Training Accounts. Section II provides background on the current research on ITA implementation. In subsequent sections the legal requirements pertaining to each of the policy issues are covered in detail along with examples of how local areas have chosen to address the issues.

I. POLICY ISSUES

Under WIA local workforce investment boards (WIBs) are required to provide services to job seekers and employers through one-stop centers. Local WIBs are required to provide adults and dislocated workers sequential access to three categories of services—core services,⁶ intensive services⁷, and training services.⁸ While individuals accessing training services must have accessed at least one core service and one intensive service, the federal statute and regulations leave local WIBs broad discretion in setting specific policies for determining who will be eligible for training services. In the case where the local board determines that funds are limited, they are required to prioritize services for low-income individuals and public assistance recipients. However, local boards have the flexibility to determine their own criteria for defining priority populations. Local boards also establish the processes by which individuals gain access to and approval for ITAs. Local WIBs have the flexibility to limit the value and duration of ITAs, as well as to determine the types of training and training-related services for which ITAs can be used. Once individuals are approved for ITAs, they are supposed to be given maximum

⁶ Examples of core services include job search and placement assistance, career counseling, and information on filing claims for unemployment compensation. Core services are universally accessible.

⁷ Examples of intensive services include comprehensive and specialized assessments, development of an individual employment plan, and short-term pre-vocational or job readiness services. After accessing at least one core service, intensive services are available to individuals who are unemployed, are unable to obtain employment through core services, and are determined by a one-stop operator to be in need of more intensive services to obtain employment; *or* who are employed, but are determined by a one-stop operator to be in need of intensive services in order to obtain or retain employment that allows for self-sufficiency.

⁸ Examples of training services would include occupational skills training, on-the-job training, skill upgrading and retraining, and entrepreneurial training. For detailed information on eligibility for training services, see Section III.

consumer choice in selecting a training provider from the State Eligible Training Provider list.⁹ An ITA is then established to pay the selected provider for services.¹⁰

There are three basic policy determinations that local areas must make with regard to ITAs:

- What is the process for determining an individual's eligibility for training and approval for an ITA?
- Who, if anyone, has priority for training services?
- What limitations will be placed on ITAs?

II. RESEARCH ON ITA IMPLEMENTATION

What we know from the research on the use of vouchers for training services may be informative in helping local communities set ITA policies. Two major national studies have been conducted and a national ITA demonstration project is currently in the process of being implemented.

NACo skills grants survey. In 1997 the National Association of Counties (NACo) received information from 252 local JTPA substate areas in response to a survey about their use of vouchers ("skills grants") to pay for training services for dislocated workers.¹¹ The survey revealed that 136 of the areas were using vouchers and that 98 provided vouchers to over half of their Title III participants. Ninety-one areas set caps on the dollar amounts of vouchers and the average maximum was \$4,781. The caps ranged from \$1,500 to \$14,000. Among the 136 programs that used vouchers, 76 percent allowed vouchers to be used for training only. Four percent allowed vouchers to be used for basic readjustment services (job search and placement assistance) and training. Five percent allowed grants to be used for basic readjustment services, training and support services. Areas with higher caps did not necessarily allow a greater number of services to be covered. For example, in those areas where vouchers covered both basic readjustment and training services, the average cap was \$3,500. In areas where vouchers covered training and support services, the average cap was \$3,627. However, in areas where

⁹ Each state develops a training provider certification system with established procedures and standards that local boards must use in reviewing applications of institutions seeking to provide training. Training providers certified by local boards are added to the state list. While training providers approved to receive Federal funds under Title IV of the Higher Education Act or under the National Apprenticeship Act automatically receive initial eligibility, all other institutions must meet minimum Federal performance requirements, as well as other requirements that may be established by the State or local area. With goal of maximizing consumer choice, the eligible training provider list is required to include descriptions of provider training programs, as well as performance and cost information. Unless training funds for the program year have been exhausted, the one-stop operator must refer an individual approved for training to the selected provider, and establish an ITA for the individual to pay for training (20 CFR § 663.440).

¹⁰ For a more comprehensive review of the requirements of the Workforce Investment Act see Savner, S. (August 1999). *Key Implementation Decisions Affecting Low-Income People Under the Workforce Investment Act*. Kellogg Devolution Initiative Paper. Washington, D.C.: Center for Law and Social Policy.

¹¹ Note: The survey had a 39% response rate.

vouchers paid for training only, the average cap was \$4,868. The average amount spent per voucher was \$3,598.

Fifty-four percent of areas that used vouchers indicated that they provided moderate staff intervention in case management and career guidance, while 38 percent said they provided intensive intervention and 3 percent responded that they provided minimal intervention. Five percent of areas responded that the level of staff intervention was dependent on individual needs. Forty-three percent of areas reported that consumers had complete choice in selecting training programs, while 57 percent reported that individuals did not have complete choice (e.g. they were restricted to training in demand occupations, training appropriate to educational background or aptitude, etc.).¹²

Career Management Account demonstration. Prior to the passage of the Workforce Investment Act in 1998, the Department of Labor made grants to 13 local areas for demonstration projects to implement consumer choice systems using vouchers to pay for training for dislocated workers. The vouchers in the demonstration project were referred to as Career Management Accounts or CMAs. Several sites implemented voucher systems, while maintaining their more traditional staff-directed systems, which allowed for comparisons between CMA and non-CMA participants.

The CMA demonstration sites had maximum expenditures per participant that ranged from \$2,700 to \$10,000. The evaluation found that while the relationship between increasing voucher values and better outcomes was weak, the way in which the available dollar amount was communicated to participants appeared to affect participants' behavior. Those who were not told about limits had less incentive to stretch dollars to try to cover more, while those who knew about limits seemed to try to allocate vouchers across various costs such as tuition, books, tools, and transportation.

The evaluation of the CMA Demonstration project concluded that a voucher system is likely to work as well as a staff-directed system, and may lead to somewhat higher satisfaction among both participants and staff. The researchers concluded that while CMAs seemed to yield slightly better employment and wage outcomes, the evidence was weak. Costs per individual were substantially higher for CMA participants than for non-CMA participants. While there was some evidence that larger increases in spending resulted in larger improvement in outcomes, the effect was small and inconclusive.¹³

ITA demonstration. In the fall of 2000 the Department of Labor issued a request for proposals for a new set of ITA demonstration projects. The selected sites are scheduled to begin enrolling participants eligible for ITAs in July 2001. The findings from the evaluation of this demonstration may be informative in determining effective practices. Under the new

¹² Kenny, C. (June 1997). *Survey on Selected Training Services for Dislocated Workers under the Job Training Partnership Act: Use of Skill Grants/Vouchers and Reemployment Services for Profiled Workers in Title III Programs Across the Nation*. Washington, D.C.: National Association of Counties.

¹³ *Dislocated Worker Program Report: Findings from the Career Management Account Demonstration*. (July 1999). U.S. Department of Labor, Employment and Training Administration.

demonstration projects, three approaches to ITA implementation that utilize best practices in informed participant choice counseling will be tested: Structured Participant Choice, Guided Choice, and Maximum Participant Choice. See Appendix A for an explanation of each of these approaches.

III. ELIGIBILITY FOR TRAINING SERVICES

Federal requirements. Under WIA individuals who are eligible to receive training services include employed and unemployed adults and dislocated workers who:

- Have met eligibility requirements for intensive services, have received at least one intensive service, and have been determined to be unable to obtain or retain employment through such services;
- After interview, evaluation, or assessment, and case management, have been determined by a one-stop operator or one-stop partner to be in need of training services and to have the skills and qualifications to successfully complete the selected training program;
- Select a program of training services that is directly linked to the employment opportunities either in the local area or in another area to which they are willing to relocate;
- Are unable to obtain grant assistance from other sources to pay the costs of such training or require WIA assistance in addition to other sources of grant assistance. (Other sources include Welfare-to-Work funds, state-funded training grants, Trade Adjustment Assistance and Pell Grants.)¹⁴

Individuals who receive training services through the adult funding stream must be determined eligible in accordance with any established state or local priority system.¹⁵ While Individual Training Accounts are not permitted for youth participants, individuals age 18 and above who are deemed eligible for training under adult and dislocated worker programs may receive ITAs through those programs.¹⁶

Local approval processes. In many local areas it appears that caseworkers will play an important role in determining eligibility for ITAs and will have significant discretion in doing so. Most local plans simply state the statutory requirement that training services will be provided after interview, evaluation, assessment and/or case management. In some local areas it appears that one-stop operators and partners will be responsible for developing ITA systems and determining policy. Beyond stating that interview, evaluation, or assessment will occur, some local policy documents provide limited additional details about the process that will be entailed in gaining access to and approval for an ITA:

¹⁴ 20 CFR §663.310 (a)-(d)

¹⁵ 20 CFR §663.310 (e)

¹⁶ 20 CFR §664.510; Under WIA, eligible youth are age 14 through 21 years and adults are age 18 and older; thus, individuals age 18 through 21 may be eligible for both adult and youth programs. There are no specified age requirements for the dislocated worker program.

- The **Atlanta** Regional Workforce Board’s sample ITA policy for its five local WIBs suggests the following additional requirements, which allow for exceptions: training must result in a self-sufficiency wage without the aid of public assistance; training must be at least 12-quarter hours per week to accommodate Unemployment Insurance requirements; training must generally be within a reasonable commute of the local area; ITA policies will apply to Pell/HOPE funds; ITAs may be used for training-related expenses.¹⁷
- According to the **Baltimore** city local plan, participants choosing and deemed appropriate to access training through ITAs will attend an ITA workshop which will provide an in-depth orientation to the ITA process. An ITA packet will be provided to individuals, who will have to justify that their career choice has high growth projections; thoroughly research career choice and compare performance and services offered by training vendors; conduct interviews with training providers, graduates, and persons working in the chosen field; and research job opportunities. One-stop staff will review applications and forward them to a review panel for rating. Those with an 80 percent or above rating will receive approval for training and a “Welcome to ITA” packet that provides the start date and estimated end date of training. Participants will be required to submit attendance and grades to center staff and participate in job search beginning 30-60 days prior to the estimated training completion date.¹⁸
- The **Chicago** Workforce Board’s plan states that the board will “likely competitively contract with a third party to review client transitions from intensive services to training and make voucher payments.”¹⁹
- According to the **Denver** plan: “Customers who have been assessed and identified with specific barriers to employment are issued ITAs only after their specific barriers have been addressed.”²⁰
- The Gulf Coast Area of Texas (13-county region that includes **Houston**) has developed a fairly detailed ITA policy that applies to any individual referred from a Gulf Coast Careers (GCC) center to receive training regardless of funding stream.²¹ An ITA is established if after an in-depth assessment of skills, abilities, interests, and attitudes, an interview, and development of a service plan, it is determined that a participant needs training to meet his or her employment goal. After all other available resources are identified, the amount of GCC money needed will be set aside in an ITA, which represents the center’s obligation to pay for tuition, fees, books and supplies for training.

¹⁷ *Application for Training Provider Agreement*. (December 6, 2000). Local Workforce Investment Boards in the Metropolitan Atlanta Ten-County Area. Available: <http://www.atlantaregional.com/workforce/Application.pdf>

¹⁸ *Baltimore City Workforce Investment Act Five-Year Plan*. Baltimore Office of Employment Development. Available: <http://www.oedworks.com/whatsnew/index.htm>.

¹⁹ *WIA Title I Adult Activities Transition Plan*. (April 28, 2000). Mayor’s Office of Workforce Development (p. 23). Available: http://w4.ci.chi.il.us/WorkforceDevelopment/WIA/chicago_adultplan.pdf.

²⁰ *Workforce Investment Act Five Year Plan for the City and County of Denver*. (March 23, 2000). (p. 41).

²¹ Funding streams may include WIA, Temporary Assistance for Needy Families, Food Stamps Employment and Training, and Welfare-to-Work funds.

ITAs cannot be used to pay for transportation, child care or living expenses. An Individual Referral Form is completed for the participant by staff and forwarded to the selected training provider. A common Vendor Agreement is used, although staff have discretion in negotiating payment points. The price of training cannot be negotiated beyond what has been approved by WIB and is reflected on list of approved vendors.²²

- The local plan for **Louisville-Jefferson County** states that an individual who has documented a need for specific training meets with one-stop staff to select the appropriate training and training provider. The WIB and the selected training provider enter into a vendor agreement and the customer submits a certificate to the provider indicating the WIB's "intention to pay off the shelf prices for training rendered on behalf of the customer."²³
- **Minneapolis** has additional eligibility requirements including a reasonable expectation that the individual will receive an average wage²⁴ that can lead toward self-sufficiency with the training; and a reasonable expectation that the individual will complete the training program based on the one-stop partner and/or operator's assessment.²⁵
- The **Nashville-Davidson County** plan provides several conditions under which an individual can access training services including:
 - "The customer could not find employment at a living wage or at wage recovery in a demand occupation without training."
 - "It is reasonable to believe that training is the most significant obstacle to employment (as opposed to poor work habits, homelessness, etc)."
 - "The chosen course of training is the shortest route to employment at wage recovery or at a living wage."
 - "The training can be completed, and the customer can be employed in his/her targeted field within 2 years of entering the training program."²⁶
- The **Omaha** plan states that if eligibility requirements are met, "Participants will help determine the amount needed for the training voucher."²⁷
- The policy for Multomah, Washington, and Tillamook Counties in Oregon (including the city of **Portland**) provides that one-stops and partners will determine who approves ITAs. Some one-stops may leave the decision to individual counselors; others may use committees for this purpose.²⁸

²² *Gulf Coast Careers Workforce System Operational Standards and Guidelines. Educational Services. Individual Training Account Policy (Attachment G), Standard 402.* (April 6, 2000).

²³ *Louisville-Jefferson County Workforce Investment Board Local Plan* (June 1, 2000). (p. 9).

²⁴ The term *average wage* is not defined in the Minneapolis plan.

²⁵ *Minneapolis Employment and Training Program Workforce Investment Act 2000 Plan.* Available: <http://www.westmetro.org/Documents/METP/2000Wiaplan-METP.pdf>.

²⁶ *Nashville-Davidson County Local Strategic Plan for 7/1/00-6/30/04* (pp. 24-25).

²⁷ *Greater Omaha Tri-County Alliance Workforce Investment Board Local Plan* (p. 50).

²⁸ Information taken from <http://www.worksystems.org/>

“Work First” policies. Some local areas have stated “work first” policies that apply to the approval process for ITAs. For example:

- The **Charlotte-Mecklenburg** policy states “In keeping with the workfirst philosophy, each WIA customer must interview and receive refusal from at least three (3) jobs in order to be considered as a candidate for training . . . Each customer must complete a minimum of three (3) exploratory interviews with prospective employers in the expected area of training. Customers who are underemployed must provide documentation that additional training will provide increased earnings.”²⁹ According to the local policy, WIA funds cannot be used to pay for more than one semester of developmental courses. Courses must be completed within six semesters. Students must maintain a “C” average to continue to receive WIA services. Except those enrolled in skills upgrade training and underemployed, students must be enrolled full-time based on the curriculum outline.
- According to **Virginia** state policy, the state’s “voucher system supports a ‘work first’ philosophy, so that those who cannot find employment through core and intensive services will logically be those with substantial barriers to employment and self-sufficiency. As such, vouchers for job training shall be accompanied by a strong case management system that provides the counseling assistance and the supportive services necessary for the success of those individuals.”³⁰

Incumbent worker eligibility. WIA allows that incumbent workers who need services to obtain employment that provides for “self-sufficiency” are eligible for intensive and training services. The statute defines self-sufficiency as the Lower Living Standard Income Level (LLSIL) as determined annually by the Secretary of Labor (see Table 1 below). However, states and local areas have the option to set higher standards, and several local areas have chosen to utilize alternate definitions of self-sufficiency as follows:

- **Baltimore** (city): Annual wage greater than or equal to 200 percent of LLSIL.
- **Charlotte-Mecklenburg**: For adults, employment that pays at least the LLSIL, ultimately eliminates dependency on cash assistance, and reduces dependency on all other government assistance; for dislocated workers, 80 percent of wage at time of dislocation.³¹
- **Houston** (Gulf Coast Area): For adults, 150 percent of LLSIL; for dislocated workers, the higher of 150 percent of LLSIL or 90 percent of wage at time of dislocation.
- **Jackson, Lenawee, and Hillsdale Counties** in Michigan: Michigan Family Independence Agency Child Care Subsidy Eligibility Level. For example, the maximum

²⁹ *Joblink Career Center System Workforce Investment Act Individual Training Account Procedure*. Charlotte-Mecklenburg Workforce Development Consortium. (p.1)

³⁰ *Virginia’s Training Voucher System under WIA and Exceptions. Policy 00-8*. Virginia Employment Commission.

³¹ *Joblink Career Center System Workforce Investment Act Individual Training Account Procedure*. Charlotte-Mecklenburg Workforce Development Consortium. (p.1)

income at which a family of four can qualify for a child care subsidy is \$31,032, which is higher than the LLSIL for a family of four.

- **Philadelphia:** The Self-Sufficiency Standard for Philadelphia.
- **Washington, D.C.:** Employment that pays a wage equal to the wage calculated by The Self Sufficiency Standard for the Washington, D.C. Metropolitan Area, for the appropriate family composition.³²

Table 1. Lower Living Standard Income Level

Region	2000 Lower Living Standard Income Level (family of 4) ³³	Percentage of 2000 Federal Poverty Level Income (family of 4)
Northeast – Metro	\$29,390	172%
Northeast – Non-Metro	\$29,000	170%
Midwest – Metro	\$27,360	160%
Midwest – Non-Metro	\$25,780	151%
South – Metro	\$25,800	151%
South – Non-Metro	\$24,510	144%
West – Metro	\$29,090	171%
West – Non-Metro	\$28,470	167%

IV. PRIORITY FOR TRAINING SERVICES

Federal requirements. In cases where funds allocated to a local area for adult employment and training activities are limited, public assistance recipients and other low-income individuals must receive priority for WIA Title I-funded intensive and training services.³⁴ Because in most cases funding is limited, states and local areas are required to establish criteria for determining local availability of funds and processes for applying priority.³⁵ Criteria can include the availability of other employment and training funds, the needs of specific groups, as well as other appropriate factors.³⁶ If public assistance recipients and other low-income individuals are given priority for services, this does not necessarily mean that other individuals meeting eligibility requirements may not receive services.³⁷ The statutory priority applies only to adult funds for intensive and training services, not to dislocated worker funds.³⁸

³² Washington, D.C. Workforce Investment Implementation Act of 2000 §3

³³ Source: *Federal Register*, 65(93), (May 12, 2000).

³⁴ 29 USC §134(d)(4)(E); 20 CFR §663.600(a)

³⁵ 29 USC §134(d)(2)(E)

³⁶ 20 CFR §663.600(a)

³⁷ 20 CFR §663.600(e)

³⁸ 20 CFR §663.610

Local criteria. While many local plans simply state that if it is determined that funds are limited, priority for training services will be given to low-income individuals and public assistance recipients, some also specify criteria for applying priorities. For example:

- **Barry, Calhoun, and Branch Counties** in Michigan: When funds are limited, the following have “high priority” for intensive and training services: individuals with disabilities that constitute a barrier to employment, minorities who reside in high poverty areas of the MWA,³⁹ new entrants to the labor market, including students transitioning from school-to-work, offenders including incarcerated individuals, recently discharged veterans, displaced homemakers.⁴⁰
- **Huron, Lapper, Snilac and Tuscola Counties** in Michigan: “A Tool Chest priority worksheet will be completed on customers. The worksheet will provide a service(s) priority ‘ranking’ based upon individual barriers to employment (e.g. public assistance recipients, other low-income persons, illiteracy handicapped, etc.).”⁴¹
- **Jackson, Lenawee, and Hillsdale Counties** in Michigan: The local board will review funds annually. The board has determined that for the first year, funds are *not* limited; therefore, *no priority has been established*.⁴²
- **Los Angeles (city)**: Priority will be given to low-income persons including the homeless, those receiving public assistance, those who are medically subsidized, those living in Section 8 housing, the unemployed, and the low-income working poor.⁴³
- **Macomb/St. Clair, Michigan**: “Priority will be given to recipients of public assistance who receive cash welfare or food stamps, as well as low-income individuals whose wages are at or below the LLSIL for the most recent year and who are unemployed.”⁴⁴
- **Minneapolis** has determined that adult funds are limited and will *only* be used to serve low-income and welfare recipients who are residents of the City of Minneapolis.⁴⁵
- **The Montgomery County, Maryland (greater Washington, D.C. area)** policy prioritizes services using a “most in need –most likely to benefit approach.” Most-in-need criteria include the lack of a high school diploma, disabilities, multiple job losses in the past year, being 40 years of age or older, and limited English proficiency. Most-likely-to-benefit criteria include being identified for early intervention and being likely to benefit from “value added” training that is brief, readily available and cost effective.⁴⁶

³⁹ Michigan Works Area

⁴⁰ *Comprehensive Five-Year Local Plan for Barry, Calhoun and Branch Counties* (p. 36).

⁴¹ *Comprehensive Five-Year Local Plan for Huron, Lapper, Snilac and Tuscola Counties* (p. 19).

⁴² *South Central Michigan Comprehensive Five-Year Local Plan*.

⁴³ *Los Angeles Strategic Five-Year Local Workforce Investment Plan for Title I of the Workforce Investment Act of 1998* (p.19).

⁴⁴ *Macomb/St. Clair Comprehensive Five-Year Local Plan* (p. 19).

⁴⁵ *Minneapolis Employment and Training Program Workforce Investment Act 2000 Plan*.

⁴⁶ *Award Determination Form Individual Worksheet*. Montgomery Works CTC, Inc.

- **Northern Virginia** (Fairfax, Prince William and Loudoun Counties and Fairfax, Falls Church, Manassas and Manassas Park cities in the greater Washington, D.C. area): Training services are available to adults and dislocated workers who have annual household incomes below 200 percent of the LLSIL. Seventy percent of available adult training funds are designated for households with annual income less than 100 percent of the LLSIL. Thirty percent of adult funds are designated for households with annual income less than 200 percent of the LLSIL.⁴⁷
- **Philadelphia**: The following populations will receive priority for services in the order in which they are listed: customers receiving TANF or other supplemental public supports; customers who fall below the LLSIL; customers who earn less than 75 percent of the income necessary to reach self-sufficiency as defined by the Philadelphia WIB; customers who earn between 76 and 99 percent of the income necessary to reach self-sufficiency as defined by the Philadelphia WIB.⁴⁸
- **Richmond, Virginia**: In addition to public assistance recipients and low-income individuals, the city's ITA policy emphasizes "ensuring resource availability for inner city populations in need."⁴⁹
- **Saginaw/Midland Bay, Michigan**: Priority will be given to participants in need of skill training who have barriers to employment including minorities and workers in low and moderate skill occupations who have less than a high school diploma. Additional target groups include people in poverty, people with disabilities, teenage parents, persons with limited English proficiency, people with substance abuse problems, and offenders.⁵⁰

V. LIMITATIONS ON ITAS

Federal requirements. Broad discretion has been left to state and local boards in setting limits on ITAs. State or local boards may limit the dollar amount and the duration of ITAs. Limits can be set for individual participants based on the needs identified in their employment plans, or limits can be set that are applicable to all ITAs. The state or local board may establish a range of amounts (e.g. \$900 - \$4,000) and/or a maximum amount (e.g. \$5,000 per year). The regulations provide that limitations established by state or local board must be described in the state or local plan, but should not be implemented in a manner that limits customer choice in selection of an eligible training provider. State or local ITA policies may provide for exceptions to limitations in individual cases. When other funding is available to supplement an ITA, participants may choose training that costs more than the maximum allowable ITA. Other funding may include Pell grants, scholarships, and severance pay, as well as other sources.⁵¹

⁴⁷ *Northern Virginia Local Plan.*

⁴⁸ *Self-Sufficiency Standard for the Philadelphia Workforce Investment Area.*

⁴⁹ *Policy 00-01: Workforce Investment Act Priority of Service for Adults Youth and Dislocated Workers.* (December 12, 2000). Richmond Workforce Investment Board (p. 1).

⁵⁰ *Saginaw/Midland Bay Five Year Comprehensive Plan* (p. 16)

⁵¹ 20 CFR §663.420(a)-(e)

Some local boards have specified limitations on how ITA funds can be spent. For example, some areas allow funds to be spent only on *training services*, while other areas also allow funds to be spent on *training-related services*, such as transportation.

ITA payment systems may be set up using a number of different means including electronic funds transfer, vouchers, or other appropriate methods (e.g., credit or debit cards, etc.). Payments may also be made incrementally at various points during the training course.⁵²

Local policies. Of the 76 local areas from which we received plans and policy documents, only 25 provided specific information on the ranges and limitations on ITAs. Information on ITA caps and durations for those 25 local areas is presented in Table 2. The caps on dollar amounts established by local WIBs from which we received information range from \$1,000 to \$10,000, with some boards setting different caps for different types of training. Maximum durations established by the WIBs range from six months to two years and also often depend upon the type of training.

Table 2. ITA Dollar Amounts and Durations

Local Area	Maximum or Range	Duration
Atlanta, GA	\$5,000 for first year; \$8,000 for training that lasts 2 years	2-year maximum
Atlantic Cape May, NJ	\$4,000	Not specified
Baltimore (city), MD	\$7,000	1 year
Barry, Calhoun, and Branch Counties, MI	No limit	Training that can be completed in 2 years or less.
Bergen County, NJ	\$4,000 Remedial education for dislocated workers: \$1,000	2 years
Boston, MA	No established maximum	Not specified
Charlotte-Mecklenburg, NC	\$4,000	2-year maximum
Cumberland/Salem, NJ	\$4,000 for skill training \$1,300 for academic/remedial/English proficiency training	Not specified
Dallas, TX	\$10,000	2 years
Denver, CO	\$3,000	Not specified
Fresno, CA ⁵³	\$4,000	1 year
Houston, TX (Gulf Coast Area)	\$4,500, but exceptions can be made	2 years, but exceptions can be made
Indianapolis, IN (Marion County)	\$2,500 /year	Not specified
Jacksonville, FL	Currently, no limitations	Not specified

⁵² 20 CFR §663.410; Few of the local plans and ITA policies we reviewed describe in detail the payment systems that will be used.

⁵³ To be reviewed periodically.

Local Area	Maximum or Range	Duration
Kansas City, MO (and surrounding counties)	Suggested average of \$2,500	Training that can be completed within a 1-year time period ⁵⁴
Little Rock, AR	Community Colleges/Technical Institutes: \$3,000 4-Year State Colleges: \$4,000 Private For-Profit Technical Schools: \$3000 Private 4-Year Colleges: \$4,000	2-year maximum
New York, NY	\$2,000	Not specified
Omaha, NE	Adults: \$4,000/year Dislocated workers: \$2,000/year Youth: \$2,000/year	Valid for 2 years
Philadelphia, PA	\$6,000 ⁵⁵	Not specified
Phoenix, AZ	Short Term: \$3,000 Long Term: \$4,000 Associates Degree: \$2,500 On-the-Job Training: \$2,000-4,000 Training reserve: Based upon need Training outside the local area: TBD (approved local area maximum will be reduced by 15%)	6 months or less Over 6 months Over 6 months No less than 320 hours of training 6 months or less TBD
Pittsburgh & Allegheny County, PA	\$10,000	2-year maximum
Portland, OR & surrounding counties ⁵⁶	Set by individual one-stops	Not specified
Saginaw/Midland Bay, MI	\$6,500 (supplies limited to \$100)	Not specified
San Diego, CA	\$5,000 lifetime limit	Not specified
San Jose, CA	No limit	Not specified

While some local areas have not set specific dollar limits on the values of ITAs, they have provided detailed guidance as follows:

- In the **Boston** area no limitations on amount or duration have been set. Based on a pilot project the Boston area did with ITAs using one-fourth of their FY2000 JTPA funds, it is anticipated that the average ITA is likely to be between \$3,900 and \$4,000, with most

⁵⁴ Electronic communication, Peggy Martinez, Full Employment Council, Inc. (January 26, 2001).

⁵⁵ Based on the median of all training programs forwarded by the Philadelphia Workforce Investment Area for the Eligible Provider List. The median is calculated January 1 and July 1 each year and is then rounded to the nearest \$500. (*Interim Policy on Individual Training Accounts*. (December 9, 1999). Philadelphia Workforce Investment Board).

⁵⁶ *Individual Training Accounts: How to set up an ITA and help your customer use it!* Worksystems, Inc.

being somewhat lower. Boston has already issued a number of ITAs.⁵⁷ According to the *Boston Best Practices Guide*, “While no cap is established for the cost of the ITAs, the average of all ITAs in the system is expected to be approximately \$4,000 per individual enrolled.”⁵⁸

- While the **Minneapolis** plan does not specify limits on ITAs, the current budget estimates that during the first year in the adult program, 18 participants will be provided with WIA-funded training services at a cost of \$2,200 per participant. In the dislocated worker training program, the budget estimates that 48 participants will be provided with WIA-funded training services at a cost of \$2,421 per participant. However, the plan does not specify what portion of these costs will be used for ITAs.⁵⁹
- The **Northern Virginia** ITA policy states, “To the extent possible, the individual worth of an ITA will not exceed the average cost of training based on the norm of the industry. Together with the customer, the case manager will negotiate the worth of the ITA within that normal range.” According to staff to the local board “the industry norm will be judged by comparing program costs listed by different institutions on the State Consumer Report Guide to Eligible Training Providers . . . No specific range or dollar ceiling has been established by the Board to date.”⁶⁰
- In the **Portland**, Oregon area (Multnomah, Washington, and Tillamook Counties), individual one-stop centers are given discretion to set customer spending caps and allocation guidelines. The duration of the ITA is established in the customer’s activity plan, spending plan and rights and responsibilities.⁶¹
- For the **San Francisco** area the limitations on ITAs can be summarized as follows: “Since all ITAs in San Francisco are ‘performance-based, cost-reimbursement, subcontracts’ for either ‘individual referral, classroom training programs’ selected from the Eligible Training Providers List (ETPL) or for ‘on the job training programs’ negotiated directly with employers as ‘customized training’, the budget amounts and durations of such subcontracts are virtually unlimited. We always attempt ‘to customize’ the budget amount and the duration of those subcontracts to fit the specific needs of the person to be trained, the requirements of the specific job for which s/he would be trained, and the specific needs of the employer, within the limits prescribed by law.”⁶²

⁵⁷ Personal communication, Jack Clark, Mayor’s Office of Jobs and Community Service (January 24, 2001).

⁵⁸ *Boston Best Practices Guide* (August 15, 2000). (p. 26).

⁵⁹ *Minneapolis Employment and Training Program Workforce Investment Act 2000 Plan*.

⁶⁰ Electronic communication, Diana Reing, Northern Virginia Workforce Investment Board (December 12, 2000).

⁶¹ *Individual Training Accounts: How to set up an ITA and help your customer use it!* Worksystems, Inc.

⁶² Electronic communication, Raymond R. Holland, Private Industry Council of San Francisco, Inc. (December 21, 2000).

- Similar to the Minneapolis plan, the plan for **St. Paul-Ramsey County**, Minnesota, estimates that 110 individuals will be served through the adult program at a cost of \$2,089 per participant and 88 individuals will be served through the dislocated worker program at a cost of \$1,811.93 per participant.⁶³
- **Florida** law requires that a minimum of 50 percent of adult and dislocated worker funds in each local area be allocated to ITAs.⁶⁴ However, state law does not any specify dollar amounts for individual ITAs that local areas must establish.

CONCLUSION

While many local workforce investment boards have developed ITA policies, how these policies will be implemented in most local areas remains to be seen. In addition, some boards are currently still in the process of developing policies, and questions exist in many local areas regarding the adequacy of funding levels for training services. Although at this early stage there do not appear to be any clear trends in the way local areas have chosen to structure ITA policies, we expect to see further advancements in the both the development and implementation of ITA policies in the coming months. As local areas begin establishing ITAs and as performance measurement data becomes available, our understanding of the impact of ITAs on low-income individuals' access to training services should be enhanced.

⁶³ *Local Plan for the Workforce Investment Act (March 11, 2000).*

⁶⁴ Amendment to Workforce Florida Act of 1996 in SB 1566.

APPENDIX A

Structured Participant Choice:

- *Philosophy:* Maximizes return on local training investments.
- *ITA structure:* ITA amounts are “customized” to the participant, not to exceed an established cap. Counselors are aware of the maximum, but participants are only aware of the amounts of their individual ITAs. ITA pays for only direct training costs. Training related expenses are paid with other sources based on need and availability.
- *Required counseling activities:* After ITA orientation, participant is required to attend weekly sessions covering: high-return training options, aptitude for high-return occupations, training options in the participant’s selected occupation, returns to training in selected occupation, and feasibility of optimal training selection(s).
- *Counselor’s role:* Directs participant to training selections on State Eligible Training Provider list that maximize return on investment. Approves only a recommended program after participant completes required counseling activities.

Guided Choice:

- *Philosophy:* Balances participant choice and counselor guidance. According to the Department of Labor, this approach is “designed to broadly represent the approach localities are most likely to adopt as they make the transition to the new WIA training environment.”
- *ITA structure:* All participants receive a fixed ITA amount that is much lower than the Structured Participant Choice cap. Participants and counselors are aware of the fixed amount prior to selecting a training provider. ITAs can be used to pay for direct training costs and related expenses. No other financial assistance is available.
- *Required counseling activities:* After ITA orientation, participant is required to attend weekly sessions covering training options in the selected occupation and feasibility of the proposed training selection(s).
- *Counselor’s role:* Guides participant to appropriate training strategies. Approves participant’s choice if: participant has completed required counseling activities, the selection is covered in the State Eligible Training Provider List, and the selection appears feasible with ITA and other available resources.

Maximum Participant Choice:

- *Philosophy:* Maximizes participant choice and flexibility over training decisions.
- *ITA structure:* Same as within the Guided Participant Choice approach (see above).
- *Required counseling activities:* After ITA orientation, none required.
- *Counselor’s role:* Available as a resource to participant. Approves participant’s choice if selection is on the State Eligible Training Provider list.⁶⁵

⁶⁵ Adapted from Notice of Availability of Funds and Solicitation for Grant Applications: *Grants for Implementing Individual Training Account Approaches through the ITA Experiment*. (September 7, 2000). U.S. Department of Labor, Employment and Training Administration. Available: <http://www.wdsc.org/sga/sga/00-111sga.htm>.

APPENDIX B

Local Area	WIBs and/or Local Entities Contacted	Document(s) Received & Reviewed
1. Albuquerque, NM*	Central Area Workforce Investment Board	Central Area Workforce Investment Plan: First Draft (June 1,2000)
2. Alcona, Alpena, Cheboygan, Crawford, Montmorency, Oscoda, Otsego and Presque Isle Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
3. Alger, Delta, Dickinson, Marquette, Menominee, and Schoolcraft Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
4. Antrim, Benzie, Charlevoix, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee, Missaukee, and Wexford Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
5. Arlington-Alexandria, VA*	Alexandria/Arlington Workforce Development Consortium	Local Strategic Plan: Title I Workforce Investment Act and the Wagner-Peyser Act
6. Atlanta, GA	Atlanta Regional Workforce Board	Workforce Investment Act Training Information for Customers; Workforce Investment Act Training Information for Partner Agencies: Questions and Answers Related to WIA Training Provider Certification and Individual Training Accounts; Application for Training Provider Agreement
7. Atlantic-Cape May, NJ	Legal Services of New Jersey	Five Year Strategic Plan (March 2000)
8. Baltimore (city), MD	Baltimore City Workforce Investment Board/Office of Employment Development	Workforce Investment Act Five Year Plan
9. Baraga, Gogebic, Houghton, Iron, Keweenaw, and Ontonagon Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
10. Barry, Calhoun, and Branch Counties, MI	Michigan League for Human Services	Comprehensive Five Year Local Plan for Barry, Calhoun, and Branch Counties
11. Bergen County, NJ	Legal Services of New Jersey	Five Year Plan (July 1, 2000)
12. Berrien, Cass, and Van Buren Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
13. Boston, MA	Mayor's Office of Jobs and Community Service	Boston Best Practices Guide (August 15, 2000)
14. Burlington County, NJ*	Legal Services of New Jersey	Burlington County Workforce Investment System Comprehensive Five-Year Plan (March 31, 2001)
15. Camden County, NJ*	Legal Services of New Jersey	Camden County Five Year Strategic Plan

Local Area	WIBs and/or Local Entities Contacted	Document(s) Received & Reviewed
16. Charlotte-Mecklenburg, NC	Charlotte-Mecklenburg Workforce Development Board	Charlotte-Mecklenburg Five Year Workforce Development Plan; Individual Training Account Procedure (July 13, 2000)
17. Chicago, IL	Chicago Workforce Board/Mayor's Office of Workforce Development	WIA Title I Adult Activities Transition Plan (April 28, 2000)
18. Chippewa, Luce and Mackinac Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
19. Cleveland, OH*	City of Cleveland Division of Human Resources	City of Cleveland, Ohio Workforce Area No. 3 Local Workforce Investment Plan
20. Clinton, Eaton and Ingham Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
21. Cumberland/Salem, NJ	Legal Services of New Jersey	Five Year Strategic Plan (Accessed on-line July 13, 2000)
22. Dallas, TX	Worksource for Dallas County	Operational Plan
23. Denver, CO	Denver Workforce Development Board; Mayor's Office of Employment and Training	Workforce Investment Act -- Five Year Plan for the City and County of Denver (March 23, 2000)
24. Detroit, MI*	Michigan League for Human Services; City of Detroit Michigan Works! Agency Workforce Development Board	City of Detroit Comprehensive Five Year Local Plan; Procedures and Institutional Approval and Monitoring System (Revised December 13, 2000).
25. Fresno, CA	Fresno Workforce Development Board	Strategic Five-Year Local Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 for the Local Workforce Investment Area: Fresno County (September 19, 2000)
26. Ft. Worth, TX (Tarrant County)*	Tarrant County Workforce Development Board	Local Workforce Development Board Integrated Plan
27. Genesee and Shiawassee Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
28. Grand Rapids, MI*	Michigan League for Human Services	Grand Rapids Comprehensive Five Year Local Plan
29. Gratiot, Ionia, Isabella and Montcalm Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
30. Honolulu, HI*	Workforce Development Council. Hawaii State Department of Labor & Industrial Relations	Procedure Manual: Designating Training Providers as Eligible to Receive Federal Workforce Investment Act Funds through Individual Training Accounts (ITAs)
31. Houston, TX (Gulf Coast Area)	Gulf Coast Workforce Development Board	Gulf Coast Careers Workforce System Operational Standards and Guidelines. Educational Services. Individual Training Account Policy (Attachment G), Standard 402 (April 6, 2000)
32. Huron, Lapper, Snilac and Tuscola Counties, MI	Michigan League for Human Services	Comprehensive Five Year Local Plan for Huron, Lapper, Snilac and Tuscola Counties

Local Area	WIBs and/or Local Entities Contacted	Document(s) Received & Reviewed
33. Indianapolis, IN (Marion County)	Indianapolis Private Industry Council; Circle Seven Training Council	Capital Region (Region 8) Final Plan (April 1, 1999); Policy for Use of Individual Training Accounts (ITAs) Under the Workforce Investment Act in Marion County iNET One-Stop Centers (Effective date: July 1, 1999); Assessment, Service Planning, and Tracking Policy for Workforce Investment Act Services to Adults and Dislocated Workers in Marion County iNET One-Stop Centers (November 1999)
34. Jackson, Lenawee, and Hillsdale Counties, MI	Michigan League for Human Services	South Central Michigan Comprehensive Five Year Local Plan
35. Jacksonville, FL	First Coast Workforce Development, Inc.	Region 8 Local WIA Plan
36. Kalamazoo-St. Joseph, MI	Michigan League for Human Services	Kalamazoo-St. Joseph Comprehensive Five Year Local Plan
37. Kansas City, MO	Full Employment Council, Inc.	Local Plan; Electronic communication, Peggy Martinez (January 26, 2001)
38. Kent and Allegan Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
39. Lake, Mason, Mecosta, Newaygo, and Osceola Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
40. Lansing, MI*	Michigan League for Human Services	Lansing Tri-County Comprehensive Five Year Local Plan
41. Little Rock, AR	City of Little Rock Workforce Investment Board	Five Year Local Plan under Title I of the Workforce Investment Act of 1998 and Arkansas Act 1125 of 1999 for the Period July 1, 2000 – June 30, 2005
42. Livingston County, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
43. Long Beach, CA*	Greater Long Beach Workforce Development Board	Strategic Five-Year Local Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 (March 29, 2000)
44. Los Angeles County, CA*	Los Angeles County Workforce Investment Board	Strategic Five-Year Local Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 (March 31, 2000)
45. Los Angeles (city), CA	City of Los Angeles Workforce Investment Board	Strategic Five-Year Local Workforce Investment Plan for Title I of the Workforce Investment Act of 1998
46. Louisville-Jefferson County, KY	Louisville/Jefferson County Workforce Investment Board	Louisville/Jefferson County Workforce Investment Board Local Plan (June 1, 2000); Workforce Investment Board Policy and Procedures (August 1, 2000)
47. Macomb-St. Clair, MI	Michigan League for Human Services	Macomb-St. Clair Comprehensive Five Year Local Plan
48. Maricopa County, AZ* (Phoenix area)	Maricopa Workforce Connection, Inc.	Strategic Five-Year Local Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 and the Wagner-Peyser Act
49. Miami, FL	Jobs & Education Partnership Regional Board for Dade & Monroe Counties	JEP Region 23 Plan

Local Area	WIBs and/or Local Entities Contacted	Document(s) Received & Reviewed
50. Minneapolis, MN	West Metro Job Partners Steering Committee— Minneapolis Employment and Training Program	Minneapolis Employment and Training Program Workforce Investment Act 2000 Plan (printed on 5/9/00)
51. Monmouth County, NJ*	Legal Services of New Jersey	Five-Year Strategic Workforce Development Plan
52. Montgomery County, MD	Montgomery County Workforce Development Corporation	Award Determination Form Individual Worksheet
53. Morris, Sussex, and Warren Counties, NJ*	Legal Services of New Jersey	Workforce Investment Plan (March 31, 2000)
54. Muskegon and Oceana Counties, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
55. Nashville-Davidson County, TN	Nashville Career Advancement Center	Local Strategic Plan
56. New York, NY	New York City Workforce Investment Board	Comprehensive 5-Year Local Plan under Title I of the Workforce Investment Act of 1998 (October 2, 2000)
57. Northern Virginia	Northern Virginia Workforce Investment Board	Northern Virginia Local Plan; Electronic communication, Diana Reing, staff to NVWIB (December 11, 2000)
58. Oakland, CA*	City of Oakland Workforce Investment Board	City of Oakland Five-Year Plan
59. Ocean County, NJ*	Legal Services of New Jersey	Strategic Five Year Plan
60. Omaha, NE	Greater Omaha Tri-County Alliance Workforce Investment Board	Local Plan
61. Philadelphia, PA	Philadelphia Workforce Investment Board	Electronic communication, Sallie A. Glickman, Philadelphia Workforce Investment Board (December 22, 2000); Interim Policy on Individual Training Accounts (December 9, 1999); Self-Sufficiency Standard for the Philadelphia Workforce Investment Area (March 9, 2000).
62. Phoenix, AZ	Phoenix Workforce Information Network	Phoenix Workforce Information Network draft policy (received December 28, 2000)
63. Pittsburgh and Allegheny County, PA	Three Rivers Workforce Investment Board	Strategic Plan 2000-2003 (July 7, 2000); WIA Comprehensive Operational Plan (July 1, 2000-June 30, 2001—Draft); Allegheny County/Pittsburgh WIA Draft Transitional Plan
64. Portland, OR (Multnomah, Washington, and Tillamook Counties)	Worksystems, Inc.	www.worksystems.org ; Guidelines for Establishing Individual Training Accounts; Individual Training Accounts: How to set up an ITA and help your customer use it!
65. Richmond, VA	Richmond Workforce Investment Board	Workforce Investment Act Priority of Service for Adults, Youth and Dislocated Workers. Policy Number 00-01 (December 12, 2000)
66. Sacramento, CA*	Sacramento Employment and Training Agency	Sacramento Works! Career Centers Draft ITA Policy (received December 27, 2000)

Local Area	WIBs and/or Local Entities Contacted	Document(s) Received & Reviewed
67. Saginaw/Midland Bay, MI	Michigan League for Human Services	Saginaw/Midland Bay Five Year Comprehensive Local Plan; Saginaw Midland Bay MWA Workstatement. Available: http://www.michiganworks.com/documents/ita.pdf
68. San Diego, CA (city & county)	San Diego Workforce Partnership, Inc.	Workforce Investment Act Strategic Five-Year Local Plan for San Diego City and San Diego County (July 2000)
69. San Francisco, CA	Private Industry Council of San Francisco, Inc.	Strategic Five-Year Local Workforce Investment Plan (February 29, 2000); Electronic communication, Raymond R. Holland, Private Industry Council of San Francisco, Inc. (December 20, 2000)
70. San Jose, CA	Silicon Valley Private Industry Council as Interim Workforce Investment Board	Strategic Five-Year Local Workforce Investment Plan (March 1, 2000); Electronic communication, John Lang (January 29, 2001)
71. Seattle-King Co., WA*	Seattle/King County Workforce Development Council	Local Unified Plan, accessed at www.seakingwed.org/unifiedplan (August 22, 2000)
72. St. Paul-Ramsey County, MN	Ramsey County Job Training Administrative Office	Local Plan for the Workforce Investment Act (March 11, 2000)
73. Union County, NJ*	Legal Services of New Jersey	Local Unified Strategic Plan
74. Washington, DC	District of Columbia Workforce Investment Council	Five Year Strategic Plan (accessed August 15, 2000); Workforce Investment Implementation Act of 2000; Government of the District of Columbia, Office of Contracting and Procurement, Solicitation number CF-00-113-RFP-JW
75. Washtenaw County, MI*	Michigan League for Human Services	Comprehensive Five Year Local Plan
76. Wayne & Monroe Counties, MI (excluding Detroit)*	Michigan League for Human Services	Comprehensive Five Year Local Plan

*We were unable to find ITA information relevant to the policy issues covered in this report in the local plans and documents we received from these areas.

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