


**Local Workforce Innovation and Opportunity Act (WIOA) Policy No. 2017-PL-06**

To: All Training Providers, Educational Institutions, Delegate Agencies,
American Job Centers and Sector Centers

From: 
Karin M. Norington-Reaves
CEO, Chicago Cook Workforce Partnership

Subject: INDIVIDUAL TRAINING ACCOUNT (ITA) POLICY

Date: September 7, 2017

Purpose:

The purpose of this communication is to establish policy for the issuance of Individual Training Accounts (ITAs) under the Workforce Innovation and Opportunity Act (WIOA). The Chicago Cook Workforce Partnership (The Partnership) seeks to promote a system of high-quality occupational skills training that both addresses business needs, and prepares individuals for career opportunities.

References:

WIOA Sections 122, 134

WIOA Implementing Rule Section 680, Subpart C and D

Illinois Department of Commerce WIOA Policy 15-WIOA-5.3

Background:

An ITA is a financial subsidy in the form of a voucher that allows qualified WIOA customers to access eligible training programs. The Illinois Department of Commerce directs the investment of ITA funds in the state through its regional Demand Occupation List, a list of occupations for which training vouchers may be issued in each region of Illinois. Based on analysis of Cook County's labor market (current and projected job demand, wages, educational requirements, and career pathways), The Partnership has highlighted a subset of occupations on the Demand Occupation List that are of critical importance to our local area. The result is the attached list of 40 Target Occupations for ITAs in Cook County.

Target Occupations for ITAs in Cook County:

The Partnership will only authorize ITAs for customers to attend an eligible training program¹ that is geared toward employment in one of the 40 Target Occupations.² This will ensure that The Partnership's ITA investments are strategically aligned with the needs of jobseekers and employers in our local labor market. The Partnership reserves the right to amend the list in response to shifting local labor market conditions, and also reserves the right to approve special projects featuring training outside the list of Target Occupations.

ITA Cost Limits:

The Partnership has established a 3-tiered (\$3,000, \$5,000 and \$8,000) tuition and fee limit for ITAs. The tuition limits are listed in the attachment. For some occupations, The Partnership will allow for additional costs above the tuition limit, including books, uniforms, and tests for licenses or industry-recognized credentials. Test costs will not be paid until the actual exam has been completed, except in limited circumstances. The Partnership is analyzing these "extras" and may amend the attachment to include the cost limits for those items not included in tuition.

NOTE: WIOA requires that ITA funding be applied only AFTER exhausting other available sources including Pell and MAP grants.

ITA Duration Limits:

The length of an ITA must not exceed the length of the Individual Employment Plan (IEP). Career coaches must set training timelines that are expeditious but also meet the unique needs of the customer. For example, where possible and appropriate a customer wishing to attend an Associate Degree program at a Community College should take as many classes as possible each semester rather than taking one class per semester. An ITA for a longer-term degree program will only be approved if the customer can demonstrate that he or she has less than 24 months remaining and an outstanding balance of less than the maximum ITA limit for the applicable program (i.e.; \$3,000, \$5,000 or \$8,000).

Second ITAs:

In general, there is a limit of **one** ITA per person, dating back to the launch of The Partnership July 1, 2012. However, a second ITA may be approved if:

- The customer has successfully completed one ITA-funded training course; and is requesting a training program in the same or related subject/field (e.g. along a career pathway) which will provide additional skills to support their move toward self-sufficiency,
- The subsequent ITA provides training in a field where the customer is able to use transferrable skills, or
- In exceptional circumstances, at the discretion of The Partnership.

A second ITA will not be approved if the customer withdrew from or failed to complete the initial ITA-funded training course. A customer receiving a subsequent ITA may only access the

¹ Training provider eligibility and certification is detailed in policy letter 2017-PL-07 issued September 7, 2017 by Chicago Cook Workforce Innovation Board.

² The attached list of 40 Target Occupations pertains solely to ITAs and does not prohibit the use of customized training or On-The-Job-training funds in sectors or occupations not listed therein.

balance of the original lifetime ITA funding maximum amount as applicable based on the voucher limit tiers.

ITA Process:

This represents the general process for parties involved in requesting, redeeming, and administering an ITA. See the Partnership's ITA Manual for detailed procedures.

1. A WIOA delegate agency may request an ITA on behalf of a customer who has been determined eligible and in need of training services as a part of career path.
2. The Career Coach will direct customers to compare training programs using the attached list of Target Occupations and the WIOA Training Programs feature found at illinoisworknet.com.
3. Unless a valid accommodation is requested, the customer must visit at least two programs before making a selection, in order to evaluate the facilities, accessibility, personnel, environment, and content of each, and must complete a training provider exploration form.
4. The Career Coach must verify that the selected program aligns with the goals outlined in the customer's Individual Employment Plan (IEP) or Individual Service Strategy (ISS).
5. The Career Coach will submit a request for an ITA to the Training Assessment and Review Agency (TARA).
6. The TARA will review the application in Career Connect and verify that:
 - a. The applicant is a registered WIOA Adult, Dislocated Worker or Out- of- School Youth customer (1A, 1D, 1Y) and WIOA eligibility documentation is complete;
 - b. The customer has received a basic service and has an IEP or ISS on file;
 - c. The customer has pursued other applicable funding sources, such as Pell Grants or MAP grants, and award amounts are in the Financial Statement Form;
 - d. The customer has completed a training provider exploration form;
 - e. The requested training program is authorized by The Partnership in the WIOA Training Programs feature found at illinoisworknet.com;
 - f. The ITA amount does not exceed the cost limit shown on the WIOA Training Programs feature on illinoisworknet.com nor does it exceed the tuition limits outlined in the attached list of 40 occupations;
 - g. In the event that the tuition cost exceeds the ITA tuition limit, the customer and Career Coach have made payment arrangements and documented those on the Financial Statement Form;
 - h. In the event of a self-referral (the Career Coach/service provider and the selected training program are part of the same organization) the customer has completed the Customer Choice documentation for self-referrals.³
7. The TARA will determine the appropriateness of the request for training and communicate its decision to the WIOA delegate agency in a timely manner. No customer may attend classes until the TARA issues confirmation of approval.
8. The TARA will issue a Letter of Credit (LOC) also called a "Voucher" or "ITA"

³ A TARA representative may contact the customer who has received the self-referral to administer or brief telephone survey. If the customer indicates that he/she was not given a choice of training providers, he/she will be referred back to the delegate agency. The agency must resubmit the training request with documentation to show that the customer has reviewed a list of training program information.

Other Considerations:

- *Use of ITAs for Youth Programs:* The use of ITAs is permissible for Youth 16-24 who are enrolled as “Out-of-School” Youth. The Career Coach must ensure that the youth continues to have access to WIOA youth program services and that the ITA will enhance, not supplant the delivery of those services. Further, the Career Coach must determine that the ITA is not used as an enticement to terminate traditional academic programs, and that the training will help the youth achieve economic and career goals.
- *Self-Referrals:* As noted above, a self-referral occurs when the agency processing the customer’s ITA application is also the agency that will provide the training. In an effort to ensure that the issuing agency is an honest broker of ITAs, self-referrals are permitted, however, self-referrals will be carefully monitored by the TARA. Customers applying for a self-referral ITA may be surveyed by the TARA to determine if the customer was given the opportunity to explore other training options. The Partnership reserves the right to limit the number of self-referrals.

Action Required:

This policy should be distributed to appropriate all staff including Career Coaches and those responsible for issuing ITAs and to all staff responsible for budgeting, vouchering and accounting.

Inquiries:

Inquiries should be directed via email to Anne Hogan, Occupational Training Manager, at ahogan@workforceboard.org

Effective Date:

Immediately upon Board approval.

Attachments:

A—Target Industries and Occupations for ITAs, Revised August 2017

Attachment A: 40 Target Occupations for ITA Training, updated August 2017

		Occupation	SOC Descriptions	Tuition/ Fee Limit
1	Business and Professional Services	Administrative and Office Worker	Executive Secretaries and Executive Administrative Assistants	\$ 3,000
2		Legal Secretaries and Paralegals	Legal Secretaries	\$ 5,000
			Paralegals and Legal Assistants	\$ 8,000
3		Accountants and Financial Clerks	Billing and Posting Clerks	\$ 5,000
			Payroll and Timekeeping Clerks	
	Brokerage Clerks			
	Accountants and Auditors			
4		Human Resources Specialists	Human Resource Specialists	\$ 5,000
5		Security Guards	Security Guards (waiver)	\$ 3,000
6		Dental Hygienists and Dental Assistants	Dental Hygienists	\$ 8,000
			Dental Assistants	\$ 5,000
7		EMTs and Paramedics	Emergency Medical Technicians	\$ 3,000
			Paramedics	\$ 8,000
8		Registered Nurses and LPNs	Licensed Practical and Licensed Vocational Nurses	\$ 8,000
			Registered Nurses	
9		Medical Assistants	Medical Assistants	\$ 8,000
10		Health Information Technicians	Medical Records and Health Information Technicians	\$ 5,000
11	Healthcare	Respiratory Therapists	Respiratory Therapists	\$ 8,000
12		Radiology Technicians	Radiologic Technologists	\$ 8,000
13		Lab Techs	Medical and Clinical Laboratory Technologists	\$ 8,000
			Medical and Clinical Laboratory Technicians	
14		Certified Nursing Assistants and Patient Care Technicians	Nursing Assistants	\$ 3,000
			Phlebotomists	
15		Occupational Therapy Assistants	Occupational Therapy Assistants	\$ 8,000
16		Pharmacy Technicians	Pharmacy Technicians	\$ 3,000
17		Physical Therapy Aides and Assistants	Physical Therapist Assistants	\$ 5,000
			Physical Therapist Aides	

18	Retail, Culinary, Hospitality	Food Service Workers	Food Service Managers	\$ 3,000
			First-Line Supervisors of Food Preparation and Serving Workers (waiver)	
			Chefs and Head Cooks (waiver)	
19	Hospitality Workers	Lodging Managers	\$ 3,000	
20	Retail Workers	First-Line Supervisors of Retail Sales Workers	\$ 3,000	
		Customer Service Representatives		
		Sales Representatives, Wholesale and Manufacturing		
21	Information Technology	Computer Support Specialists	Computer User Support Specialists	\$ 5,000
			Computer Network Support Specialists	
22	Computer Systems Analysts	Computer Systems Analysts	\$ 8,000	
23	Database Administrators	Database Administrators	\$ 8,000	
24	Developers and Programmers	Computer Programmers	\$ 8,000	
		Software Developers, Applications		
		Software Developers, Systems Software		
		Web Developers		
25	Network Administrators	Network and Computer Systems Administrators	\$ 8,000	
26	Computer Network Architects	Computer Network Architects	\$ 8,000	
27	Information Security Analysts	Information Security Analysts	\$ 8,000	
28	HVAC, Electrical, and Machine Repair	HVAC & Refrigeration Mechanics and Installers	\$ 8,000	
		Electrical Power-Line Installers and Repairers		
		Industrial Machinery Mechanics		
29	Machine Operators and Fabricators	Team Assemblers	\$ 8,000	
		Cutting, Punching, and Press Machine Operators		
		Food Batchmakers		
		Stationary Engineers and Boiler Operators		
		Mixing and Blending Machine Setters, Operators, and Tenders		
		Grinding, Lapping, Polishing, and Buffing Machine Operators		
		Machinists		
30	Quality Assurance	Inspectors, Testers, Sorters, Samplers, and Weighers	\$ 8,000	

31	Transportation, Distribution, and Logistics	Computer Numerical Controls	Computer-Controlled Machine Tool Operators	\$ 8,000	
32		Welders	Welders, Cutters, Solderers, and Brazers	\$ 8,000	
33		Logistics Workers	Cargo and Freight Agents		\$ 5,000
			Dispatchers, Except Police, Fire, and Ambulance		
			Shipping, Receiving, and Traffic Clerks		
			Production, Planning, and Expediting Clerks		
			Industrial Truck and Tractor Operators		
34		Vehicle Mechanics and Repair Workers	Aircraft Mechanics and Service Technicians		\$ 8,000
			Automotive Body and Related Repairers		
			Automotive Service Technicians and Mechanics		
	Tire Repairers and Changers				
	Bus and Truck Mechanics and Diesel Engine Specialists				
35	Commercial Drivers	Bus Drivers, School or Special Client		\$ 5,000	
		Bus Drivers, Transit and Intercity			
		Heavy and Tractor-Trailer Truck Drivers			
		Light Truck or Delivery Services Drivers			
36	Construction	Carpenters	Carpenters	\$ 8,000	
37		Operating Engineers	Operating Engineers; Construction Equipment Operators	\$ 8,000	
38		Electricians	Electricians	\$ 8,000	
39		Plumbers	Plumbers, Pipefitters, and Steamfitters	\$ 8,000	
40		Structural Iron and Steel Workers	Structural Iron and Steel Workers	\$ 8,000	