




**Local Workforce Innovation and Opportunity Act (WIOA) Policy No. 2017-PL-06-Change 2**

**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 19, 2019**

**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 program<sup>1</sup> that is geared toward employment in one of the 40 Target Occupations.<sup>2</sup> 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. For the purposes of this modification to Policy No. 2017-PL-06, Change 2, the 40 Target Occupation List is being amended at this time to include two additional occupational areas due to requests made to the local area and programs. The areas are: Addictions Counseling and Early Childhood Education.

### **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 Attachment A, The Partnership will allow for additional costs above the tuition limit and fee limit, including books, uniforms, and tests for licenses or industry-recognized credentials. Test costs may be paid prior to the exam however refunds will be expected from training providers in cases where the exam fees are not a part of the tuition and the participant does not take the exam within a reasonable timeframe. All books and additional training materials must be necessary for the completion of the training program. Additional guidance will be provided by the Program Unit.

**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 participant, 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.

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

<sup>2</sup> 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.

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 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, suitable 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 Approved Training Programs feature found at [illinoisworknet.com](http://illinoisworknet.com).
3. Unless a valid accommodation is requested, the customer must visit at least two programs offering the same training program 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 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 if available 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 Approved Training Programs feature found at [illinoisworknet.com](http://illinoisworknet.com);
  - f. The ITA amount does not exceed the cost limit shown on the WIOA Approved Training Programs feature on [illinoisworknet.com](http://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 and fee 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.<sup>3</sup>

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<sup>3</sup> 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.

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<sup>4</sup>
8. The TARA will issue a Letter of Credit (LOC) also called a “Voucher” or “ITA”

**Other Considerations:**

- *Use of ITAs for Youth Programs:* The use of ITAs is permissible for Youth 16-24 who are enrolled as either “In-School” or “Out-of-School”. 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@chicookworks.org](mailto:ahogan@chicookworks.org)

**Effective Date:**

September 19, 2019

**Attachments:**

A—Target Industries and Occupations for ITAs, Revised

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<sup>4</sup> Except for customers attending long-term training.

**Attachment A: 40 Target Occupations for ITA Training, updated October 2019**

Occupation		SOC Descriptions	Tuition/ Fee Limit	
1	Business and Professional Services	Administrative and Office Worker	Executive Secretaries and Executive Administrative Assistants	\$ 3,000
			Administrative Service Managers	\$ 8,000
		Legal Secretaries and Paralegals	Legal Secretaries	\$ 5,000
			Paralegals and Legal Assistants	\$ 8,000
		3	Accountants and Financial Clerks	Billing and Posting Clerks
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	Addiction Counselors	Substance Abuse, Behavioral Disorder, and Mental Health Counselors	\$ 5,000	
7	Early Childhood Education	Preschool Teachers, Except Special Education	\$ 5,000	
		Childcare Workers	\$ 3,000	
8	Dental Hygienists and Dental Assistants	Dental Hygienists	\$ 8,000	
		Dental Assistants	\$ 5,000	
9	EMTs and Paramedics	Emergency Medical Technicians	\$ 3,000	
		Paramedics	\$ 8,000	
10	RNs	Registered Nurses	\$ 8,000	
11	Other Nursing/Clinical Care Professionals*	Licensed Practical Nurses	\$ 8,000	
		Medical Assistants		
		Phlebotomists	\$ 3,000	
12	Health Information Technicians	Medical Records and Health Information Technicians	\$ 5,000	
13	Respiratory Therapists	Respiratory Therapists	\$ 8,000	
14	Radiology Technicians	Radiologic Technologists	\$ 8,000	
15	Laboratory and Diagnostic Technicians	Medical and Clinical Laboratory Technologists	\$ 8,000	
		Medical and Clinical Laboratory Technicians		
		Diagnostic Medical Sonographers		
		Surgical Technologists		
		Medical Equipment Preparers		
15	Certified Nursing Assistants and Patient Care Technicians	Nursing Assistants	\$ 3,000	
		Phlebotomists		
		Cardiovascular Technicians		
		Patient Representatives	\$ 5,000	
		Patient Care Technicians*		
16	Occupational Therapy Assistants	Occupational Therapy Assistants	\$ 8,000	
17	Pharmacy Technicians	Pharmacy Technicians	\$ 3,000	
18	Physical Therapy Aides and Assistants	Physical Therapist Assistants	\$ 5,000	
		Physical Therapist Aides		

19	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)	
20		Hospitality Workers	Lodging Managers	\$ 3,000
21		Retail Workers	First-Line Supervisors of Retail Sales Workers	\$ 3,000
	Customer Service Representatives			
	Sales Representatives, Wholesale and Manufacturing			
22	Information Technology	Computer Support Specialists	Computer User Support Specialists	\$ 5,000
			Computer Network Support Specialists	
23		Computer Systems Analysts	Computer Systems Analysts	\$ 8,000
24		Database Administrators	Database Administrators	\$ 8,000
25		Developers and Programmers	Computer Programmers	\$ 8,000
			Software Developers, Applications	
			Software Developers, Systems Software	
			Web Developers	
26	Network Architects and Administrators	Network and Computer Systems Administrators	\$ 8,000	
		Computer Network Architects		
27		Information Security Analysts	Information Security Analysts	\$ 8,000
28	Manufacturing	HVAC, Electrical, and Machine Repair	HVAC & Refrigeration Mechanics and Installers	\$ 8,000
			Electrical Power-Line Installers and Repairers	
			Industrial Machinery Mechanics	
			Maintenance Workers, Machinery	
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	Computer Numerical Controls	Computer-Controlled Machine Tool Operators	\$ 8,000	
		Computer Numerically Controlled Machine Tool Programmers, Metal and Plastic		
32		Welders	Welders, Cutters, Solderers, and Brazers	\$ 8,000

33	Transportation, Distribution, and Logistics	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	Transportation, Distribution, and Logistics	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	Transportation, Distribution, and Logistics	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

\*Please Note: Patient Care Technicians do not tie to a single O'Net code. It is used to describe medical training programs which may include training in several approved O'Net occupational areas such as CNA, Phlebotomy and EKG. The tuition price limit for these "bundled" programs shall be \$5,000.