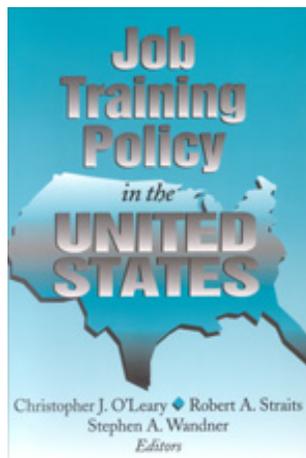# Individual Training Accounts, Eligible Training Provider Lists, and Consumer Report Systems

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Individual Training Accounts, Eligible Training Provider Lists, and Consumer Report Systems

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A crucial change brought about by the Workforce Investment Act (WIA) of 1998 has been the requirement that local workforce agencies use training vouchers, known as Individual Training Accounts (ITAs), to provide training to their customers. Training vouchers are intended to maximize customer choice in training decisions. Theoretically, if individuals use vouchers to choose the training occupations and providers they value the most, the use of training vouchers should also generally maximize social welfare. However, the success of training vouchers in maximizing social welfare depends on individuals making sensible choices based on reliable information. In an actual training market, it may be difficult for individuals to collect reliable information about occupational opportunities and training providers or to use this information effectively in making sensible training choices. Hence, the use of a pure, unrestricted training voucher with no further government role is probably unrealistic. Instead, the government training agency needs to 1) ensure that information about occupations and providers is available and accessible to customers, and 2) help customers in evaluating the information appropriately.

Under WIA, ITAs are intended to empower adult and dislocated worker customers to choose the training services they need and to raise the accountability of states, local areas, and service providers for meeting these needs. Rather than have counselors in local workforce agencies decide who receives what kind of training from which providers, under WIA, customers use their ITAs to make their own training choices. The thinking behind this legislative shift was consistent with

the general argument for vouchers described above—that customers would improve the quality of training choices by selecting the programs and providers that were most appropriate for them. The use of training vouchers was also anticipated to increase competition among training providers, thereby increasing their responsiveness to customers' needs and the overall quality of their offerings.

The ITA system established under WIA also recognizes the need to maintain an important and appropriate role for local training agencies in the administration of ITAs. WIA gives states and local areas a great deal of flexibility in both setting the value and other parameters of ITAs to maximize customer access to training and deciding how much guidance and direction counselors provide to customers as they formulate their training decisions. This flexibility allows state and local officials to specify and administer their ITAs in a way that is best suited for their local customers.

Although customers who are determined eligible for training and are awarded an ITA can use their ITAs to purchase training, their selection of a provider is constrained to approved training programs—those included on the state's Eligible Training Provider (ETP) list. To be included on the list, programs must be certified by the state and local workforce areas as meeting acceptable levels of performance. States also provide customers with data on provider performance through the Consumer Report System (CRS), which is intended to help customers make effective training decisions.

This chapter describes the shift to the use of ITAs under the new law and some of the issues that local workforce agencies have faced in designing and implementing ITA programs. Our objectives are to evaluate the degree to which local areas have been able to implement the ITA system envisioned in WIA and, based on this evaluation, discuss issues that may need to be addressed in WIA reauthorization. In the first section, we describe the experience of local workforce agencies with training vouchers prior to WIA. In the following section, we describe key provisions of WIA relating to the administration of ITAs and the selection of training providers. Then we describe the ITA Experiment, which is being sponsored by the U.S. Department of Labor (USDOL) to investigate the implications of different designs for specifying and administering ITAs. In the fourth section, we summarize the experiences of the six local areas participating in the experi-

ment in implementing ITAs, both in the early days of WIA prior to the experiment and under the ITA Experiment. Finally, we discuss the overall feasibility of ITAs as an ongoing approach to providing training and several challenges that may be addressed in WIA reauthorization.

EXPERIENCE WITH TRAINING VOUCHERS PRIOR TO WIA

To some extent, the establishment of ITAs under WIA is a reflection of a trend that had already been ongoing for years at the local level. For example, D'Amico et al. (2001) found that in 13 sites in which they studied early WIA implementation, almost all had already moved away from exclusive use of contracted training and toward individual referral methods during the Job Training Partnership Act (JTPA) era. Furthermore, half of the sites had previous experiences with using vouchers for training, either as a grantee under the Career Management Account demonstration (Public Policy Associates 1999) or as part of some other pilot program.

Moreover, a few local training agencies experimented with training vouchers many years prior to WIA. For example, the Atlanta Regional Commission first used vouchers in 1991 as a means to provide training services to about 13,000 dislocated Eastern Airlines workers when the company went bankrupt. Given the existing training infrastructure and the size of the dislocation, the commission could not handle the number of prospective trainees using the contracted class-size training approach that predominated under JTPA. The commission therefore established a voucher system and let dislocated workers choose whatever training they wanted. It found that many of the dislocated workers who were issued a voucher made poor training choices, selecting training for occupations that paid low wages, or had limited opportunities for career development. In response to this experience, the commission began to build its vendor list and monitor vendor performance, long before these responsibilities were officially established under WIA (D'Amico and Salzman forthcoming).

Local agencies that experimented with voucher programs under JTPA specifically designed programs that allowed for customer choice but still required counseling and constrained choices so as to ensure

customers made informed, appropriate choices. A Trutko and Barnow (1999) study of nine areas using voucher programs under JTPA found that eight of the nine areas used a "constrained choice" voucher model, in which the local training agency played a substantial role in approving individual training choices.[1] Under this model, the local agency screened approved vendors, limited occupational choices, provided assessment and counseling on appropriate training choices, and retained the agency's authority to reject a participant's training choice. Local administrators interviewed as part of the Trutko and Barnow study felt that a "pure" voucher model, without assessment or restrictions on training choices, would result in some participants making poor training choices and wasting resources. Many of the elements of this "constrained choice" voucher model are common under the emerging local ITA models, as we will describe later in this chapter. Local administrators in the sites studied by Trutko and Barnow felt that the use of vouchers in their sites had little effect on customer outcomes or costs, but that it improved the level of customer satisfaction (Trutko and Barnow 1999, pp. 35–37).

In the mid 1990s, in anticipation of the possible enactment of training vouchers as part of new workforce development legislation, USDOL sponsored the Career Management Account (CMA) Demonstration to test the feasibility of providing training for dislocated workers through vouchers. The CMA Demonstration was conducted from 1995 to 1997 in 13 sites (Public Policy Associates 1999). Sites continued to operate their nonvoucher programs, but they designed and operated voucher programs to be used for a subsample of their dislocated workers. The targeting of dislocated workers to receive vouchers varied widely and included, in various states, those determined most in need, profiled unemployment insurance claimants, nominations by one-stop staff, and those interested enough to apply for services. Customers were free to choose their training programs, but the local agencies required customers to participate in assessment and counseling to support their decisions. Local agencies felt that if customers had the choice of using these services or not, they would not invest adequate resources in planning their training strategy. Overall, the models developed by local agencies resembled the "constrained choice" models identified in the Trutko and Barnow (1999) research on voucher programs under JTPA. The research on the CMA Demonstration con-

cludes that voucher systems in general are likely to work just as well as a contracted-training system, and lead to somewhat more satisfied customers and staff.

THE ESTABLISHMENT OF ITAs UNDER WIA

Under the tiered service structure established by WIA, adults and dislocated workers can receive training support from local workforce areas only after they have completed minimum core and intensive service requirements established by the local one-stop center.[2] Core services include basic services to assist individuals in obtaining and retaining employment. Intensive services generally include counseling, assessment, and short-term pre-vocational services.

Once individuals complete their core and intensive service requirements, they may be determined eligible for and in need of training. WIA regulations require that local workforce areas use ITAs to provide training to adults and dislocated workers, except in some limited circumstances, to ensure that these individuals can choose their training providers. Exceptions to the use of ITAs can include funding of on-the-job training or customized training provided by an employer or training provided by an organization designed to assist special populations facing multiple employment barriers.

ITAs enable individuals to purchase training from any eligible provider, subject to the limitations established by the states and local areas. The WIA regulations allow states and local workforce areas to restrict the type or duration of training they will fund. For example, training can only be funded for positions that relate to job opportunities in the local area or to a broader geographic area if the customer is willing to relocate. Similarly, states and local areas can impose limits on the duration or costs of training. These limits can be either based on individual circumstances or established across the board. For example, the amount of an ITA may be set for an individual based on that individual's training needs. Alternatively, the state or local area may establish a range of amounts or a maximum amount that is applicable to all ITAs.

States and local areas, through their one-stop centers, are also responsible for ensuring that the training choices made by customers are supported by high-quality information and guidance. A critical component in this effort is the ETP list, which specifies training programs approved for WIA-sponsored training. The WIA legislation specifies two objectives of the ETP list. First, the list defines the training programs that may be considered by adults and dislocated workers who are undertaking training funded by WIA. At the same time, it also serves as a resource for any individual who is interested in conducting research on training providers in the state. As pointed out by D'Amico and Salzman (forthcoming), there is some tension between these two objectives, because the first objective requires that the list exclude some providers while the other objective requires that the list include enough providers to be a useful resource.

To be included on the ETP list, providers must establish their eligibility to receive ITA funds. ITAs can be used to pay only for training provided by vendors whose programs have been certified by the states and local areas as meeting acceptable performance levels on a variety of outcomes measures, including

1) the percentage of all participants who completed training,

2) the percentage of all participants who obtained unsubsidized employment,

3) the average wages at placement of all participants,

4) the percentage of WIA-funded participants who completed training and obtained unsubsidized employment,

5) the percentage of WIA-funded completers who were employed six months after the start of employment,

6) the average wages received by WIA-funded completers, measured six months after the first day of employment, and

7) if applicable, the percentage of WIA-funded completers who obtained a license or certificate, an academic degree or equivalent, or other measures of skills.

States are responsible for establishing acceptable performance levels on these measures and administering the eligibility determination process. Performance levels for each program are to be adjusted to

account for the characteristics of the local economy and the clients served.

Information on provider performance and other provider characteristics, including costs, are provided to customers through each state's CRS. The CRS is built on the ETP list and contains information provided by the training providers during the eligibility determination process. According to WIA regulations, the system "must contain the information necessary for an adult or dislocated worker to fully understand the options available to him or her in choosing a program of training services." Although the CRS is built on the ETP list, some states have chosen to make the CRS as comprehensive as possible by also including non-ITA eligible providers (D'Amico and Salzman forthcoming).

The WIA regulations left considerable flexibility for local agencies to develop their own unique programs within the broad structure described above. Given this flexibility, together with the limited experience with vouchers prior to WIA, several questions remained to be answered at the state and local levels as WIA implementation began, such as:

- What is the appropriate balance between customer choice and counselor guidance?
- How should scarce training dollars be allocated among customers through ITA awards?
- Are ITAs appropriate for adult customers as well as dislocated workers?

In the following section we describe the ongoing ITA Experiment, which is designed to specifically address some of these important questions related to the design and administration of ITAs.

THE ITA EXPERIMENT

The ITA specifications set out in WIA, as summarized above, allow states and local areas great flexibility in deciding how they will administer their ITAs. The ongoing ITA Experiment (Perez-Johnson et al. 2000) is providing a test of different approaches to managing cus-

tomer choice in the administration of ITAs.[3] The experiment is testing three alternative ITA approaches. These approaches differ with respect to both the resources made available to customers to help them access training and the involvement of local counselors in guiding customer choice.

The ITA approaches are being tested side-by-side in six local areas using an experimental design. That is, new customers determined to be eligible for training are randomly assigned to one of the three ITA approaches and are directed to participate in the activities of the ITA approach to which they have been assigned. All eligible customers receive some type of ITA offer—there is no control group of customers who are denied ITAs. The experiment also works with the existing ETP list and CRS in each of the six sites. Intake in the study sites began between December 2001 and August 2002 and continued for approximately 18 months. By the end of intake, in February 2004, 8,331 local training customers had been enrolled in the ITA Experiment and randomly assigned to one of its three ITA approaches.

The findings from the ITA Experiment will reveal how different approaches generate different training choices, employment and earnings outcomes, returns on training investments, and customer satisfaction. Importantly, this study will not assess the merits of a voucher-based approach relative to other approaches (for example, prenegotiated contracts) to helping individuals access training. Rather, the ITA Experiment departs from the premise that vouchers are the required approach and asks the questions: "What is the best way to operate voucher-based training programs?" and "When or for whom might approaches offering more or less customer choice be most appropriate?" Hence, the objective of the ITA Experiment is to provide state and local administrators with the information they need to determine which ITA approach, or combination of approaches, is most appropriate for their customers.

Selection of the ITA Approaches Being Tested

The selection of approaches to be tested in the ITA experiment was based largely on research on voucher models that existed prior to WIA or that were emerging in the early days of WIA.[4] The information gathered through this research was used to identify ITA approaches that

were consistent with WIA, had the potential for generating different training choices and outcomes, and seemed both feasible and likely to be of interest to sites implementing WIA.

In making the final selection of the three approaches being tested in the ITA experiment, we had two broad objectives in mind. First, we wanted the approaches to generally represent the spectrum of voucher models that were emerging prior to WIA and in the early days of WIA. Based on our examination of these emerging models, we developed a spectrum of ITA approaches that represent different balances between customer choice and counselor guidance in the formulation of training decisions. In the middle of the spectrum, we specified the model that sites were most likely to adopt in the absence of the experiment. Then, at one end of the spectrum, we specified an ITA approach that placed greater emphasis on customer choice and less emphasis on counselor guidance. At the other end of the spectrum, we specified an approach that reversed this emphasis to depend more on counselor guidance and somewhat less on customer choice. The limit on the amount of the voucher varied along this spectrum as well, so that the resources available to a customer were more limited in the approaches that entailed greater customer choice of training options.

The second objective in selecting the three approaches to test was to promote innovation in the use of vouchers. In the early days of WIA, most local agencies designed ITA models that looked similar to the "constrained choice" model identified by Trutko and Barnow, and there was little deviation from this model. That is, because of the limited evidence on the effects of alternative approaches and their own limited experience with vouchers, states and local areas appeared reluctant to develop voucher models that provided substantial customer choice or, alternatively, restricted customer choice in notable ways. Hence, to make the experiment as informative as possible, we selected approaches that, while feasible, pushed sites a bit beyond their comfort zone in the spectrum described above. Thus, we selected models that offered either greater customer choice or more intensive counseling than local workforce agencies were inclined to provide on their own.

Description of the Approaches Being Tested

The approaches being tested in the ITA Experiment vary along three dimensions related to the management of customer choice: 1) the method used to control each customer's ITA spending, 2) the type of counseling provided and whether it is mandatory or voluntary, and 3) the ability of local counselors to restrict the choices of customers. We use these dimensions of variation as the basis for the three ITA approaches, whose basic features are summarized in Table 6.1.

The approaches range from a highly structured approach, which we call Approach 1 or structured customer choice, to a true voucher approach, which we call Approach 3, or maximum customer choice. In the middle of the spectrum, Approach 2, or guided customer choice, is intended to broadly represent what most sites are doing on their own under WIA. In contrast, Approaches 1 and 3 are designed to be more or less structured than what most sites are doing on their own.

- **Approach 1** is the most directive of the three approaches. Customers assigned to Approach 1 participate in a series of mandatory assessment and counseling sessions designed to identify promising training opportunities. During these sessions, customers are guided by their counselor through the estimation of the benefits and costs of alternative training options and directed toward options expected to yield a high return—that is, programs that will generate earnings on a new job that are high relative to the resources invested in training. Counselors can reject training selections that are not consistent with this approach. Once appropriate training has been chosen, customers receive an ITA to fully cover the costs of training. Therefore, the amount of the ITA is considered to be customized to the individual based on the training program approved by the counselor.

- **Approach 2** broadly represents the approach that most local areas have adopted in the transition to WIA. In comparison with Approach 1, Approach 2 reduces the service requirements and allows greater customer choice, but at the same time it offers a limited, fixed ITA amount to all customers. As in Approach 1, Approach 2 customers are required to participate in structured counseling activities, but the activities are less intensive and are

Table 6.1 Summary of the Approaches Being Tested in the ITA Experiment

	Approach 1: Structured customer choice	Approach 2: Guided customer choice	Approach 3: Maximum customer choice
Award amount	Customized	Fixed	Fixed
Counseling	Mandatory, most intensive	Mandatory, moderate intensity	Voluntary
Can counselors reject choices?	Yes	No	No

not specifically focused on the return to the training investment. Once Approach 2 customers have completed their required counseling, they are free to choose any training program from the state ETP list—counselors cannot reject choice. Although Approach 2 customers can choose any training program, they receive a fixed ITA award, which limits the resources they can spend on training.

- **Approach 3** is the least structured of the approaches. It is intended to represent a true voucher program, where customers are free to spend a fixed amount of resources on any training program they choose. As in Approach 2, all Approach 3 customers receive the same fixed ITA amount and have final authority to choose their training providers from the ETP list. Unlike in Approach 2, however, Approach 3 customers are not required to participate in any counseling activities (although they may participate if they wish) prior to pursuing the training of their choice.

LOCAL EXPERIENCES IMPLEMENTING ITAs AND ETP LISTS

The six local areas participating in the ITA Experiment are located in or near Phoenix, Arizona; Chicago, Illinois; Atlanta, Georgia; Jacksonville, Florida; Bridgeport, Connecticut; and Charlotte, North Carolina, and include recognized leaders in the workforce development field. For instance, Phoenix and Atlanta participated in the CMA Demonstration. Most of the local areas also operated individual purchase or

voucher-based models for training services for five or more years prior to implementation of the ITA Experiment. Jacksonville, for example, implemented a program of "scholarship accounts" for its training customers in 1995. As we described earlier, Atlanta used vouchers in 1991 to provide training assistance to workers displaced by the bankruptcy of Eastern Airlines. Chicago had abandoned the traditional JTPA approach of contracted training 10 years ahead of the passage of WIA, relying instead on voucher-based training purchases for all of its customers since 1988. In the next section, we describe the experiences of these innovative localities implementing ITAs and related WIA training provisions.

Local ITA Models Prior to Implementation of the Experiment

In the design phase of the ITA Experiment, we visited each of the six local areas to develop an understanding of their procedures under WIA.[5] Table 6.2 summarizes the components of their training programs in the early days of WIA. Overall, we found that these local areas had, by late 2001, made substantial progress implementing WIA's training provisions.

- **Local areas included in the experiment had well-established policies on the amount and duration of their ITAs prior to the experiment.** For instance, all sites placed caps on ITA awards, ranging from $3,000 to $8,900, and awards were valid for one or two years. Customers were not generally aware of the cap unless they requested training that cost more than the cap. Some local areas had tiered caps, offering additional support to customers choosing longer programs.

- **Local areas had Internet-based ETP lists available or under development.** Five of the six areas in the experiment had electronic databases that were accessible via the Internet, while the sixth area had a system under construction. The systems varied in the extent to which they could be sorted or searched. Hard-copy versions of the ETP lists were also available.

- **All local areas had voucher procedures in place.** Most local areas retained their pre-WIA provider payment systems. All but one local area used paper vouchers to demonstrate their "promise

to pay" the training provider to serve an approved customer. None of the local areas used "smart cards" or other high-tech strategies to handle ITA administration.

Despite their extensive experience operating voucher-based training programs prior to WIA, the local areas participating in the experiment still faced several important challenges associated with building a system to administer ITAs.

- **Getting programs onto ETP lists.** Local training providers that were active under JTPA programs did not automatically qualify to serve WIA customers. All local areas indicated that they lost training offerings in the transition to WIA because some providers chose not to apply for WIA certification. Public education institutions, such as community colleges, objected to the performance-reporting requirements, as well as the requirement that they submit an application for each program at each location (as opposed to one application for a given program at all locations or even one application for the entire institution). In many cases, these institutions did not apply for WIA certification, since WIA customers represented a small proportion of their clientele. In contrast, proprietary providers more actively sought certification because WIA customers tended to represent a far larger share of their students.

- **Revising counseling.** Some local areas needed to revise their counseling activities. To implement WIA's tiered structure of services, local areas needed to boost the ability of their staff to assess customers and to provide more intensive career counseling. Local areas also needed to focus training-related counseling on options included in the ETP list (subject to local constraints as well).

- **Building the CRS.** Development of the CRS proved to be an ongoing effort. In each local area that we visited, the CRS can be accessed via the Internet, usually through the ETP list. The CRS typically contains information on program costs, duration, and so on. However, these systems still contain little information on program performance.

- **Making ETP lists and the CRS user-friendly.** Both information systems are continuously being refined to improve user sorting,

Table 6.2 Key Characteristics of Preexperiment Training Programs in the ITA Experiment Study Sites

	Phoenix and Maricopa County, AZ	Bridgeport, CT	Jacksonville, FL	Atlanta and Northeast GA	Northern Cook County, IL	Charlotte, NC
Maximum value and duration of ITA awards	**Phoenix**: $3,000 for programs less than 6 mo. in duration; $4,000 for longer programs; no maximum duration of award **Maricopa County:** $3,500 regardless of program duration; no maximum duration of award	$3,000 regardless of program duration; staff encouraged short-term training options	Tiered caps according to entry-level wages for occupation: • $4,600 if less than $8.78 per hour • $5,800 if $8.79 to $14.44 per hour • $8,900 if more than $14.44 per hour • Training support for up to 2 years	**Atlanta:** Tiered approach with $5,000 for first year and $3,000 for second year **Northeast GA:** Tiered approach with $3,000 for first year and $2,000 for second year	$3,000 per year, for up to 2 years	$4,000 in total support, usable over up to 2 years
Counseling services typically delivered prior to determination of training eligibility	• Resume workshop • Workshop on job readiness and transferable skills • Interests/aptitudes testing • Supervised job search or job club	• Assessments of basic skills and interests/ aptitudes *if requested by customer or deemed necessary by counselor* • Individual counseling • Review of recent job search activities	• Assessments of basic skills and interests/ aptitudes • Review of recent job search activities and/or supervised job search for 2 to 4 weeks	• Assessments of basic skills and interests/aptitudes • Career counseling • Review of recent job search activities	• Testing for reading/math skills (unless postsecondary degree) • Interests/aptitudes assessment • Occupational counseling • Review of recent job search activities	• Testing for reading and math skills (unless postsecondary degree) • Interests/aptitudes assessment • Individual counseling • Review of recent job search activities

Criteria used to determine eligibility for and need of training services[a]	• Unable to find employment offering self-sufficiency wages or 89% replacement of pre-dislocation wages • No basic skills deficiencies • No severe barriers to participation in training	• Counselor completes "Most In Need Assessment" based on customer's educational level and occupational skills • No severe barriers to participation in training	• Conducted "valid" job search for "suitable" employment of self-sufficiency wages or 80% replacement of pre-dislocation wages • No basic skills deficiencies • No severe barriers to participation in training	• Unable to find employment offering self-sufficiency wages or reasonable wage-replacement rate • No basic skills deficiencies • No severe barriers to participation in training	• Unable to find employment offering self-sufficiency wages or 89% replacement of pre-dislocation wages • No basic skills deficiencies • No severe barriers to participation in training	• Part of mass layoff; dislocated and long-term unemployed; or unable to find employment offering self-sufficiency wages • No basic skills deficiencies • No severe barriers to participation in training
Counseling services typically provided in support of decisions about training	• Occupational counseling • Labor market research • Research and comparison of training programs • Evaluation of training budget and overall feasibility	• Occupational counseling • Research and comparison of training programs	• Occupational counseling • Labor market research • Research and comparison of training programs • Evaluation of training budget and overall feasibility	• Occupational counseling • Labor market research • Research and comparison of training programs	• Research and comparison of training programs • Evaluation of training budget and overall feasibility	• Occupational counseling • Exploratory interviews with potential employers • Research and comparison of training programs
Criteria for approval of training selections	Directed/guided choice: • Completed counseling requirements • Demand occupation • Feasible selection	Guided/free choice: • Completed counseling requirements	Directed/guided choice: • Completed counseling requirements • Demand occupation • Feasible selection	Directed/guided choice: • Completed counseling requirements • Demand occupation • Feasible selection	Guided/free choice: • Completed counseling requirements	Directed/guided choice: • Completed counseling requirements • Demand occupation • Feasible selection

Table 6.2 (continued)

	Phoenix and Maricopa County, AZ	Bridgeport, CT	Jacksonville, FL	Atlanta and Northeast GA	Northern Cook County, IL	Charlotte, NC
Implementation status and key characteristics of ETP list	• Fully developed, operational • Available to staff and customers online (www. ade.az.gov/ arizonaheat) • Links to CRS	• Fully developed, operational • Available to staff and customers online (www. ctdol.state.ct.us / cgi-bin/ wiapub.pl)	• Web-based system under construction; accessible online; links to CRS (www.ften. labormarketinfo.c om) • Hardcopy lists of approved vendors for region, linked to Regional List of Targeted Occupations	• Fully developed, implemented • Available to customers online (www.gcic.ed/ gawia) • Links to CRS	• Fully developed, operational • Available to customers online (www.ilworkforce .org/slep.htm) • Links to CRS	• Fully developed, operational • Available to customers online (www.ncstars.org) • Links to CRS

Implementation status and key characteristics of CRS	• Operational • Available to staff and customers online (www.arizonaheat.com) • Includes information on certification date, entry requirements, program length and costs, Pell grant eligibility, location, accessibility by public transit, child care availability • Placeholders for performance info. (number enrolled, completion/ placement rates, average hourly wages at placement); information not yet available for many programs	• Under construction • Not available to customers	• Operational, integrated with ETP system, but still being fine-tuned • Available to staff and customers online • Includes program description plus information on program location, duration, costs, and credentials attained • Placeholders for performance information (placement rate, training-related placement rate, number completing, annual earnings at placement); information not yet available for many programs	• Operational • Available to customers online • Placeholders for performance information (students obtaining employment, average weekly earnings after employment); information not yet available for many programs	• Operational, but still being fine-tuned • Can be accessed online by staff or customers • Placeholders for type of training, program cost, length, location, rates of completion and employment, average quarterly earnings 6 mos. after graduating; information not yet available for most programs	• Operational, integrated with ETP system • Available online • Includes program description plus location, application date, duration, costs, credentials attained, Pell eligibility, how long organization has been in business, and business accreditation • Complete information not available for all providers • Does not include performance information

Table 6.2 (continued)

	Phoenix and Maricopa County, AZ	Bridgeport, CT	Jacksonville, FL	Atlanta and Northeast GA	Northern Cook County, IL	Charlotte, NC
ITA payment systems	• Customers receive paper voucher to take to provider/ vendor when enrolling • Vendors invoice grantee directly • No funds released directly to customers	• Counselors submit paper voucher to provider/ vendor • Vendors invoice grantee directly for training costs; no funds released directly to customers	• Grantees issue a list of approved trainees for individual vendors • Vendors invoice grantee directly for training costs; no funds released directly to customers	• Counselors submit paper voucher to provider/ vendor • Vendors invoice grantee directly for training costs; no funds released directly to customers	• Customers receive paper voucher to take to provider/ vendor when enrolling in classes • Vendors invoice grantee directly for training costs; no funds released directly to customers • Use *American Fundware* to track obligations and payments	• Counselors submit paper voucher to provider/ vendor or customer receives paper voucher to take to vendor when enrolling • Vendors invoice grantee directly for training costs; no funds released directly to customers
Allowable uses of ITA funds	• Tuition and fees • Books and other required supplies	• Tuition and fees • Books and other required supplies	• Tuition and fees • Books and other required supplies uniforms • Certifications	• Tuition and fees • Books and other vendor-required supplies	• Tuition and fees • Books and other required supplies	• Tuition and fees • Books and other required supplies
WIA-funded assistance with support service needs while in training	Available on need basis: • Child care • Transportation • Support payments	Limited resources available on a need basis: • Child care • Transportation	Available on a need basis; means-tested support levels: • Child care • Transportation	Available on a need basis: • Child care • Transportation	None offered	• Limited resources available on a need basis for transportation • Customers referred to local agency for assistance with child care

Monitoring / follow-up requirements while in training	• Counselors follow up with customers about every two weeks once they begin training • Vendors submit periodic attendance/grade reports to the grantee	• Customers asked to meet periodically with assigned counselors • Vendors required to submit periodic attendance/grade reports to grantee to receive benchmark payments	• Customers were required to submit *monthly* attendance sheets, in person, to their counselors and to submit grade reports	**Atlanta:** Customers are required to maintain *monthly* contact with counselor (or *bimonthly* if receiving supportive services) and submit attendance/grade reports (signed by instructor) **Northeast GA:** Vendors required to submit periodic attendance/grade reports to grantee	Customers are required to maintain *monthly* contact with counselor and to submit attendance/grade reports to counselor	Counselors follow up with customers periodically to discuss their progress in training

(continued)

Table 6.2 (continued)

	Phoenix and Maricopa County, AZ	Bridgeport, CT	Jacksonville, FL	Atlanta and Northeast GA	Northern Cook County, IL	Charlotte, NC
Non-ITA training options for WIA customers	• Adult basic education and GED instruction offered as intensive services • On-the-job training placements used on need basis only • Customized training; employers cover 50 percent of training costs	• Adult basic education and GED instruction offered as intensive services • On-the-job training placements used rarely (on need basis only)	• Adult basic education and GED instruction offered as intensive services • Customized training ("Skills upgrade" program); employers to cover at least 50 percent of training costs • Other special grants ("Operation Paycheck")	**Atlanta**: • Adult basic education and GED instruction offered as intensive services • On-the-job training placements on need basis only • Customized training • Other special grants **Northeast GA**: • Adult basic education and GED instruction offered as intensive services • No other forms of non-ITA training	• Adult basic education and GED instruction offered as intensive services • No on-the-job training placements or customized training • Other special grants (National Emergency grant, Information Technology grant)	• Adult basic education and GED instruction offered as intensive services • On-the-job training placements used rarely (on need basis only) • No other forms of non-ITA training

[a] All grantees followed WIA requirements for sequential eligibility for core, intensive, and training services. Hence, in addition to the criteria listed in this table, customers must have been determined eligible for WIA services and received at least one staff-assisted core service and one intensive service.

searching, and comparison capabilities. Substantial progress has been made over time. For example, the Georgia systems can be used to search training programs and providers and generate comparisons more effectively now than a year ago.

Implementation of the ITA Experiment

Based on the findings from our exploratory visits to participating local areas, we selected a site to pilot-test the experiment's proposed operational procedures. Chicago was selected to serve as the pilot site and began operations in December 2001. The ITA Experiment operated as a pilot at this site for about six months, and we used the site's experiences to refine the experiment's procedures before starting operations in the five remaining local areas.[6] The other localities began operating the experiment in stages, from May through August 2002.

Commonalities across local ITA programs

The experiment's ITA approaches are operated fundamentally in the same way across the participating local areas. That is, each local area is testing all three approaches side by side and counselors work with customers assigned to all three approaches. ITA operations are also the same in other important ways.

- **Counseling services made available.** The same types of training-related counseling services are made available to *all* ITA customers, regardless of the approach to which they are assigned. What varies across the approaches is whether participating in particular services is mandatory or not. Moreover, the experiment's counseling services represent the minimal set made available to customers. Local areas can offer, though not require, additional counseling.

- **Allowable uses of ITA funds.** Study participants have access to ITA funds to cover the same types of training-related expenses. The ITAs of customers assigned to all three approaches include funds to cover only their direct training costs—that is, tuition, fees, and other expenses directly related to the program chosen (for example, books and supplies). Customers can still access support for other training-related needs not covered by their ITAs

(for example, child care or transportation). If offered with WIA funds, such assistance must be provided through methods other than the ITA (supportive payments, for example).

- **Use of other sources of support for training.** Consistent with WIA regulations, when approving release of ITA funds, local staff always take into consideration other sources of support available to the customer (for example, state scholarships or Pell grants). As part of the experiment's counseling activities, local staff help their assigned ITA customers identify and apply to all relevant sources of training support before tapping WIA funds. There are no restrictions on customers' use of training funds from sources other than WIA.

- **Case manager approval of ITA expenditures.** Study participants do not have direct control of the funds in their ITA accounts. After a training program and vendor have been approved, disbursement of ITA funds still requires authorization by local staff. Thus, customers cannot receive approval for a program and then decide unilaterally to apply the approved ITA funds to a different selection.

Differences across local ITA programs

Implementation of the ITA Experiment did not completely homogenize WIA training operations across the participating local areas. Differences in their ITA programs reflect practices left unchanged by the experiment, local circumstances, or both:

- **Services delivered prior to random assignment.** For the most part, implementation of the ITA Experiment left unchanged the core and intensive services that local areas delivered prior to determining a customer's eligibility for WIA-funded training. Prior to the experiment, the local areas varied in how they formulated sequential eligibility procedures under WIA and their minimal service requirements prior to approving a customer for training. For instance, to ensure that a "valid" job search has been conducted, Jacksonville requires customers to document fully recent work search efforts, participate in supervised job search activities, or both. In contrast, in Chicago, counselors may approve WIA training services based solely on semistructured

discussions with the customer. These philosophical differences persist under the ITA Experiment.

- **ITA values.** Across all local areas, the cap on Approach 2 and Approach 3 fixed ITA awards is more modest than the maximum potential value of Approach 1 customized awards. However, the actual caps for fixed and customized ITAs vary across the local areas, reflecting differences in their WIA training budgets, expected client flow, and the prices of local training options.

- **ETP lists and CRS.** The experiment relies on the ETP lists and CRSs available at each of the participating local areas. As required by WIA regulations, all study participants are instructed to make their selection from their states' ETP lists. Similarly, customers are encouraged to use the CRS when researching their training options. These systems vary nevertheless in the range of available training options, the costs and durations of these options, and the information that is available to customers to support their decisions about training.

Preliminary Implementation Findings from the ITA Experiment

Once the local areas began operations, we held regularly scheduled telephone conferences with key staff to discuss issues related to implementation of the ITA Experiment. These conversations served as an opportunity to answer staff questions, clarify procedures, and provide technical assistance when it was needed. About 1½–2 months after the start of operations, we also conducted intensive in-person monitoring and technical assistance visits. In preparation for these visits, we reviewed selected case files of participants assigned to each of the experiment's approaches.[7] In addition, evaluation staff have been periodically reviewing data entered into the experiment's Study Tracking System, which collects information on ITA counseling activities completed by participants, ITA award amounts, training selections (including program costs and other training resources tapped prior to ITA funds), and payments made out of the customers' accounts.[8]

Implementation of the experiment in six local areas has demonstrated that each of the ITA approaches is broadly feasible, in the sense that local staff report no major difficulties in the administration or

operation of any approach. The key distinctions among the three approaches are clear to staff, and customers are generally reported to be completing their ITA requirements with few questions or objections. Local staff confirm that Approach 2 is similar to the local programs that were in place prior to the experiment, except that the forms and worksheets used in the experiment provide a bit more structure and consistency in the counseling process. In contrast, Approaches 1 and 3 clearly differ from the preexperiment ITA programs—Approach 1 in requiring more intensive counseling and in attempting to match individual customers to the training choice expected to generate high earnings relative to resources invested (high return), and Approach 3 in having no counseling requirements and allowing customers full control over their training decisions. Staff have generally expressed satisfaction with the forms and worksheets used under Approach 1, although some counselors feel that Approach 1 is too intensive to be applied to all customers seeking an ITA, particularly those that have already developed their own training plans.

   Our observations of the early operations of the ITA Experiment suggest additional tentative conclusions, which we will eventually test more rigorously in our data analysis.

- **Counseling can influence customer choice.** Local staff report that the structured mandatory counseling for Approaches 1 and 2 has helped some customers explore their training options more broadly and more carefully. Staff cite cases in which customers who come into a one-stop center with a specific training plan have reconsidered their initial plans and have instead selected alternative training plans that promise higher earnings, better opportunities for advancement, or greater compatibility with their personal circumstances. For example, counselors in Florida report that they have persuaded some Approach 1 customers that were originally focused on information technology (IT) training to instead pursue careers in a medical field that would better match their skills and offer better local employment prospects.

- **Some staff struggle with being directive under Approach 1.** Although many counselors appear to be influencing customer training decisions in Approach 1, some counselors struggle with being as directive with these customers as is required under the

approach. These counselors are reluctant to disapprove customers' training choices, even when those choices are expected to generate relatively low returns. They tend to weigh heavily non-cost factors—such as a school's proximity to the customer's home, the program's start date and duration, or the vendor's reputation—when evaluating training alternatives. One challenge is that many counselors are relatively young and inexperienced, which makes it hard for them to confidently guide their customers, especially when they are highly experienced workers. The Chicago site responded to this challenge by having a senior staff member sit in on Approach 1 counseling sessions to provide reinforcement in guiding customer choices.

- **ITA caps may constrain customer choice.** Local staff assert that customers prefer shorter, intensive programs (typically offered by proprietary schools), since these programs help customers return to work sooner. However, these programs tend to be expensive—often costing more than the Approach 2 and 3 fixed ITA awards—and few customers qualify for alternative sources of support for training. Hence, many Approach 2 and 3 customers are not able to access these programs, while these selections are often approved and fully covered for Approach 1 customers. Examples of this difference in training access were observed in Chicago, where one customer who was laid off from an IT employer and assigned to Approach 1 used his customized ITA to fully pay for a proprietary school IT certification course costing $8,000. In contrast, a customer who was laid off from the same employer and assigned to Approach 2 received a fixed ITA of $3,000, which did not fully cover the costs of the same IT certification program. Since this customer could not afford to pay the remaining training costs, he decided not to enter that program.

- **Customers seldom use voluntary services.** Although counseling services are offered on a voluntary basis to customers assigned to Approach 3, most of these customers are not taking advantage of the services. Among customers enrolled in the ITA Experiment for one month or longer as of late January 2003, only 5 percent of Approach 3 customers participated in any ITA counseling beyond their mandatory orientation, compared with 56 percent of

Approach 2 customers and 60 percent of Approach 1 customers.[9] Local staff report that many Approach 3 customers submit their program selections immediately after orientation, based on information they have gathered on their own prior to orientation.

- **Training rates may vary by approach.** While data on actual enrollment in training and program completion are still scarce, rates of program approval already appear to vary across the three ITA approaches. Tracking system data show that 65 percent of Approach 3 customers secured ITA program approval, compared to 58 percent of Approach 2 customers and 59 percent of Approach 1 customers.[10] The higher program approval rate for Approach 3 customers is not surprising given the approach's "pure voucher" design. However, the lower approval rates for Approaches 1 and 2 could also reflect delays as these customers complete their counseling requirements. We are confident that the differences in training rates by approach are not due to differences in the timing of customers' program approval. Tracking system data show that, at the time of our data extract, study participants had been enrolled in the ITA Experiment for an average of 14 months. Tracking system data also show that study participants secured program approval, on average between six and eight weeks after random assignment, depending on their approach assignment. This suggests that tracking system data are likely to capture entry into training for the vast majority of ITA customers who reached this milestone.

ISSUES IN DESIGNING AND ADMINISTERING ITA PROGRAMS

In this chapter, we have sought to answer important questions related to the implementation of ITAs and other training-related provisions of the WIA. The information presented herein represents some of the most current evidence available to evaluate the program changes introduced by WIA and to help manage programs sponsored by the legislation. In this section, we attempt to shed light on important policy

questions likely to be debated in preparation for WIA reauthorization, in particular:

- Should prominent WIA innovations—ITAs, ETP lists, and CRSs—be preserved as part of reauthorization?

- What legislative or regulatory modifications might help ease some of the challenges that states and localities have encountered implementing key WIA provisions?

Overall Soundness of the ITA Approach

Our observations suggest that local areas are able to implement ITA programs that are consistent with the objectives of WIA in the following sense:

- **Local areas are able to use ITAs as their principal method of paying for training.** The local areas participating in the ITA experiment have moved decisively away from prenegotiated contracts for training. At the same time, they continue to make some use of alternative training arrangements, such as on-the-job training or customized training. These alternatives extend customer choice beyond ITAs and help workforce agencies respond to special customer and employer needs (for example, when a customer needs to upgrade skills while working or when an employer has difficulties finding applicants for desirable job openings).

- **Local areas can specify ITAs so as to achieve different balances between customer choice and counselor guidance.** Local areas are apprehensive about the effect of customer choice on local WIA performance. Thus, in the absence of the ITA experiment, local areas have tended to develop similar programs that constrain the training choices and resources available to any customer. Yet, the ITA Experiment demonstrates that local areas can operate alternative programs that either minimize the constraints on customer choice (as under Approach 3) or maximize the role of counselors in directing customers to promising opportunities and matching the training resources to those opportunities (as under Approach 1).

- **The ETP lists provide sufficient training options to support the ITA approach.** Despite widespread and ongoing concerns about provider participation in the ITA system, the ETP lists in the local areas participating in the ITA Experiment have provided most urban customers with a real choice of providers. Hence, the current system seems to provide a foundation from which to build and enhance customer choice.

Importantly, the kind of institutional change envisioned by WIA may take longer to occur in other local areas. As we noted, the local areas participating in the ITA Experiment are recognized leaders for innovation and relatively experienced in the operation of voucher-based training programs. Hence, their experiences implementing ITAs, ETP lists, and CRSs likely represent a better-than-typical or best-case scenario. At the same time, they demonstrate the overall feasibility and soundness of the ITA approach.

Further Consideration Needed: ETP Lists and the CRS

As WIA reauthorization proceeds, there are several issues related to the ETP lists and the CRS that may require further attention and revision.

- **States could play a larger role in building the training provider network.** Future legislation and regulations could specify, or at least highlight the potential for, a larger role for states in promoting the ITA system. Local staff tend to recruit local providers and support them in the certification process. However, they lack sufficient leverage with larger providers to gain their support for and participation in the system. States could do more, such as requiring public educational institutions to comply with WIA requirements. For example, prior to WIA, Florida had already mandated that all state-funded postsecondary educational institutions (including community colleges) provide data on various performance measures. Once WIA was passed, these same data provision requirements were simply carried over to the WIA provider approval process.

- **The certification and performance reporting requirements should be reexamined.** To become an eligible provider of train-

ing services and maintain such eligibility, WIA requires educational institutions to submit information on program costs and (at least annually) verifiable, program-specific information on a variety of "all student" and "WIA student" performance measures. Providers that serve relatively few WIA customers find these performance-reporting requirements burdensome and, therefore, a disincentive to participation in the ITA system. As evidenced by the limited availability of performance information in CRSs, they have also proven challenging to meet for those providers that have elected to participate in the ITA system. Some states have attempted to make participation in the ITA system less burdensome for providers by working out data-sharing agreements to enable workforce agency staff to evaluate provider performance using UI wage records. For example, Georgia worked out agreements with the governing agencies of the two postsecondary systems by which the workforce agency would match and compile data on customers from the UI wage records and provide those data to the postsecondary agencies.

- **Building user-friendly systems will take time.** Local areas have made important progress in developing and implementing their ETP lists and CRSs. Progress has been slow, since the technical development of the systems and the assembly of program information has required substantial time, effort, and resources. Nearly every state now has a Web-accessible ETP list and CRS containing descriptive information on approved programs. However, many states still need to fill gaps in the program information provided on the CRS—especially on provider performance. Improvements to user sorting, searching, and comparison capabilities also continue to be made. Refinements to both systems are likely to continue for some time.

CONCLUSION

Empowering customers and increasing accountability are key goals of the workforce investment system established under WIA. The use of ITAs and the creation of ETP lists and CRSs are important ele-

ments in the overall strategy for achieving these goals. By enabling customers to choose training from among a menu of eligible providers, ITAs are intended to empower customers to obtain the training services that best fit their needs. Training providers, in turn, have to demonstrate successful performance to remain eligible to receive funds under WIA. The CRS makes available key information on the performance of training providers, empowering customers—with their ITAs and the guidance and support of one-stop staff—to make well-informed training decisions.

Looking ahead to WIA reauthorization, the emerging ITA systems appear to provide the customer choice and empowerment intended by the legislation. If adjustments are needed, they are less in the overall approach and more in the infrastructure that is used to control and monitor access to training providers. Securing broad participation of training providers in the ITA system and getting reliable performance data on the providers remain a challenge. The incentives for provider participation and the burden of performance reporting requirements could be better balanced.

The ITA Experiment will eventually provide information on how three distinct ITA approaches affect the training decisions and outcomes of training customers. We will use these data to evaluate the relative cost-effectiveness of the approaches. Intake into the experiment continued for a total of 18 months, with an additional 6 months for the pilot site. Over that period, we have conducted additional visits to each site to observe intake and operations, and continue to gather feedback on the experiment from customers, training providers, counselors, and other local staff. A 15-month follow-up survey of the customers in the experiment is already under way. This survey collects information on customer satisfaction, service and training use, employment and earnings, and a variety of other outcomes. Along with the 15-month follow-up survey, UI wage records will be the primary source of employment and earnings data for the evaluation. Employment and earnings will be measured for the full sample in the four calendar quarters after random assignment; additional quarters may be available for early enrollees. An interim report on the preliminary findings from the experiment will be produced in the summer of 2004, and a final report will be produced in 2005.[11]

As evidenced by President Bush's proposal of a new program of Personal Reemployment Accounts (PRAs), the appeal of "pure vouchers" continues to be strong. Embodied in H.R. 444, the Back to Work Incentive Act, which was introduced in Congress on January 29, 2003, the goal of PRAs is to provide unemployed workers who are likely to exhaust their unemployment insurance benefits with additional assistance and incentives to help them get back to work sooner. The proposed PRAs would have two components—a reemployment bonus and a broad service voucher component. Under the service voucher component, PRA recipients could use their accounts, containing up to $3,000 each, to pay for intensive services, training, supportive services, and even assistance to purchase or lease an automobile the worker needs to accept a promising job offer. Moreover, as in Approach 3 of the ITA Experiment, PRAs would have no counseling requirements. Recipients would be able to choose the combination of services that best meet their needs and use their PRAs to pay for those services. Thus, PRAs would extend the application of vouchers to the full range of assistance offered by one-stop centers, not just training, and give individuals even greater flexibility and control over the use of these resources. This suggests that the findings from the ITA Experiment should be of interest not only to local areas charged with implementing ITA programs, but to the wider workforce development community and potentially to proponents and critics of vouchers alike.

Notes

We thank Ralph Smith for helpful comments.

1. The one exception was the Thumb Area Employment and Training Consortium located in eastern Michigan. The program in this area was closer to a pure training voucher model. Customers in this site were eligible to open a Tool Chest, which was essentially a checking account against which customers could spend down resources to purchase education, training, and a wide range of support services. Customers could spend these resources at virtually any public or private school in the local area, as well as at a range of retail stores (for example, for work clothes). The size of the account was set for customers based on their eligibility for various programs run by the consortium.
2. Some local workforce agencies originally interpreted the tiered service structure specified in WIA as requiring that local agencies use a work-first approach in serving customers. That is, agencies felt they were to focus most of their effort

and resources on getting customers into jobs and provide training only as a last resort for customers who failed to find a job. However, USDOL subsequently clarified that WIA did not require a work-first philosophy and emphasized the importance that should be placed on customers' needs.

3. The ITA Experiment is being conducted by Mathematica Policy Research, Inc., and its subcontractor, Social Policy Research. A related project, the Individual Training Account/Eligible Training Provider (ITA/ETP) Demonstration, was conducted primarily by Social Policy Research under the same contract. The ITA/ETP Demonstration examined a set of pilot sites that have designed and implemented their own models for providing ITAs to one-stop customers who seek training. D'Amico and Salzman (forthcoming) describe the ITA/ETP Demonstration in detail.

4. During the design phase of the experiment, MPR staff visited one-stop centers in Phoenix, Arizona; Baltimore, Maryland; Lowell, Massachusetts; Marlette, Michigan; and Killeen, Texas. These localities were selected principally because of their experience with training vouchers. All except Michigan had participated in the CMA Demonstration. Michigan had been operating a voucher program for all of its JTPA customers since 1996. The information from these visits was supplemented with information from 1) a review of findings from the evaluation of the CMA demonstration (Policy Research Associates 1999) and 2) site visits to two WIA early implementation states (Pennsylvania and Texas) conducted by staff from Social Policy Research.

5. These visits were conducted between July and December 2001.

6. No major changes to the experiment's operational procedures were implemented as a result of pilot operations. The only adjustments needed were providing additional guidance on Approach 1 implementation and developing some tools in Excel form to facilitate counselor use.

7. MPR staff selected these cases from lists of all individuals enrolled to date in the study. Generally, we selected two to three cases for each of the staff delivering ITA services to study participants. To allow sufficient time for participants to have received at least some ITA counseling services, we only selected cases that had been assigned to one of the experiment's approaches at least three weeks earlier.

8. Data from this system showed that, by the end of intake, a total of 8,331 customers had been enrolled in the ITA Experiment across our six study sites. As of mid-May 2004, 99 percent of these customers had been enrolled in the study for one month or longer; 92 percent had been enrolled for six months or longer.

9. The differences in participation rates for Approaches 1 and 2 relative to Approach 3 are statistically significant from zero at the 0.01 confidence level, two-tailed test.

10. The differences in program approval rates for Approaches 1 and 2 relative to Approach 3 are also statistically significant from zero at the 0.01 confidence level, two-tailed test.

11. An important limitation of the evaluation is its relatively short follow-up period (12 months for wage records and about 15 months for the survey). Because many

people in the sample will be in training for most of the follow-up period, they are likely to work less or possibly not at all in the short term. Some sample members may still be in training one year after random assignment. Thus, it may not be possible to assess posttraining impacts on employment and earnings. We will assess these impacts within the context of the proportion of the sample still in training.

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