

# CLASP

CENTER FOR LAW AND SOCIAL POLICY

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Mr. Chairman and Members of Subcommittee:

Thank you for inviting me to testify. I am a Senior Staff Attorney at the Center for Law and Social Policy (CLASP). CLASP is a nonprofit organization engaged in research, analysis, technical assistance, and advocacy on a range of issues affecting low-income families. Since 1998, we have closely followed research and data relating to implementation of the Workforce Investment Act (WIA). In addition, we often talk and visit with state officials, administrators, program providers, and individuals directly affected by the implementation of workforce development efforts.<sup>1</sup>

Today's hearing focuses on reauthorization of the 1998 Act, and improving services and empowering individuals under the Act.

The main points I wish to make are:

- The 1998 law made a set of major changes in the nation's workforce development system that were designed to:
  - improve coordination among federal workforce development initiatives by requiring that every local area create one-stop delivery systems that would require participation of a number of federally funded workforce programs, so-called mandatory partners. These new one-stop systems would provide universal access to a set of "core" services; and
  - improve the quality of training services paid for with WIA funds by requiring that training services would generally be provided through "individual training accounts" and that every training provider who received WIA funding would need to be certified based on its performance in helping participants to achieve successful employment outcomes so that those seeking training could make sound choices when selecting a program.
  
- As we have only about two and one-half years of experience with the new system, Congress should exercise caution in making changes and limit areas of change to those where there is a sound basis in experience for the proposed change and broad agreement as to the need for the change. Within this framework, experience to date suggests that there are several important challenges that Congress should address in reauthorization:
  - Since 1998 there has been a dramatic decline in the number of adults and dislocated workers receiving training services as compared to the number who received training under the Job Training Partnership Act and steps should be taken to increase training services;
  - There are important gaps in the information available about the services being provided, the performance of the new one-stop systems, and the use of WIA funds, all of which make it difficult to assess the results that are being achieved in the program;
  - Many providers are finding that compliance with the reporting requirements imposed under the provider certification system are too

onerous and, as a result, providers who are in a position to offer high-quality services may become unavailable to WIA customers.

- To address these concerns, Congress should:
  - Make additional funding available for training services, including using funds that are proposed to be used for Personal Reemployment Accounts to supplement WIA funding for training to the extent those funds are not needed to provide Unemployment Insurance extensions to those exhausting existing benefits;
  - Improve reporting on participation, outcomes, and use of funds to provide more accurate information about the nature, quality, and cost of services being provided to WIA customers;
  - Require that states bear the cost of gathering data about post-program employment and earnings for those providers wishing to obtain or maintain certification as eligible training providers, and provide additional funds to meet these costs.
  
- The Administration's proposal concerning adults and dislocated workers would consolidate three historically distinct funding streams and provide broad new waiver authority to Governors and the Administration. While other proposals included in the Administration package offer more moderate and effective proposals to meet the challenges that Congress needs to address, these broad new initiatives are unwise for several important reasons:
  - These proposals are not well supported by the experience of states and localities in implementing the current law;
  - The proposal for a new consolidated adult block grant undermines Congressional guidance regarding the balance between resources for low-income adults and for dislocated workers, and jeopardizes the funding structure of the Unemployment Insurance system by eliminating the Employment Service;
  - The proposal for broad new waiver authority jeopardizes basic protections built into current law which cannot currently be waived including nondiscrimination and non-displacement provisions, basic procedural protections for those seeking services, and the role and funding for local authorities to design systems that work most effectively in their communities.

### **Background**

The Workforce Investment Act of 1998 (WIA) substantially altered the federally funded system for job training and other employment-related services for adults, dislocated workers, and youth. Concerns about the fragmentation of federally financed job training efforts and the weak performance of many programs financed under the Job Training Partnership Act (JTPA), informed the Congressional debates that led to WIA's enactment.

The principal policy response to this fragmentation was the requirement that every local workforce board create one-stop delivery systems that provide universal access to set of “core services.” This was intended to assure that any individual would have access to employment-related services, including information about job vacancies, career options, student financial aid, relevant employment trends, and instruction on how to conduct a job search, write a resume, or interview with an employer. These core services are available to any job seeker, or anyone who wants to advance his or her career (Section 134(d)(2)). In addition, the Act defined two additional service levels, “intensive” and “training,” and developed a system of sequential eligibility intended to ensure that these latter service categories were limited to those individuals who needed access to them in order to find employment or move up in the labor market.

The Act also sought to address concerns about the weak performance of many training programs through greater emphasis on employment outcomes for those who receive intensive and training services. The new system has two key features: 1) training providers are required to meet performance-based eligibility criteria; and 2) when providing access to training, local boards are generally required to provide eligible individuals with “individual training accounts” for use with eligible providers, and individuals are intended to select providers using performance and cost information generated through the new provider certification system.

### **WIA Implementation to Date**

While states had the option to implement earlier, complete nationwide implementation of WIA was not required until July 2000. Thus, we have approximately only two and one-half years of experience to guide us in the reauthorization process. In addition, we have only the first year of data available from the WIASRD<sup>ii</sup> to provide details about the number of participants who received services and the types of services they received. Even the data that have been collected and made available leave many unanswered questions about services, expenditures, and the overall effectiveness of the new system.

One area in which information is available, at least for the first year, concerns access to training services for adults and dislocated workers. Upgrading the skills of job seekers and incumbent workers is a central task of the WIA system. While part of the rationale for the requirement of one-stop delivery systems is to ensure that individuals have access to training and education services provided by a broad array of programs and institutions, WIA resources are also intended to make a substantial contribution to the funding available for training services. CLASP’s preliminary review of WIASRD data for program year (PY) 2000 (July 1, 2000 - June 30, 2001) shows that about 42,000 adults received training services, and about another 42,000 dislocated workers received training services. (Note that the data do not include information for four states—Alabama, Louisiana, New York, and Pennsylvania—which together received approximately 15 percent of the total WIA allocation for PY 2000.) By comparison, data available about services available under JTPA in PY 1998, show that training services were provided to about 163,000 adults and 149,000 dislocated workers. (Note that the JTPA data *includes* information for the four states for which WIASRD data are not available.) This substantial decline in the number of participants receiving training is very troubling.

Observers attribute the limited use of training to several factors, including: (1) the system of sequential eligibility, which many have been interpreted to require a work-first approach; (2) the limited availability of resources for training, as large amounts have been spent on the development of one-stop systems and the delivery of core services to the general public; and (3) the strong economy during this period, which created expanded employment opportunities for many low-skill workers and job seekers. Each of these factors has probably played some role, but, whatever the reason or combination of reasons, the reality is that only a small number of adults are receiving training under WIA, and the number has plummeted since states shifted from JTPA to WIA. In addition, this decline in access to training is not simply about reduced demand resulting from strong economic conditions. A set of reports published by community-based organizations working in Washington, DC,<sup>iii</sup> Springfield, Massachusetts,<sup>iv</sup> Minneapolis, St. Paul, and Brooklyn Park, Minnesota,<sup>v</sup> reveals the difficulties encountered by low-income, unemployed and underemployed customers trying to access training services, and even basic core services, at one-stop centers. In the Minnesota and Massachusetts one-stop “testing projects,” not a single customer received job-training services, despite evidence that would lead one to believe they might be eligible for and benefit from training services. Similarly, in the Washington, DC, study, only one customer received training. In the Minnesota study, out of 56 visits paid to one-stop centers by 28 unemployed and underemployed individuals, only 6 times did customers even get beyond the point of the receptionist and speak to a staff person about services. In the Massachusetts study, none of the customers involved in the testing project even found employment through the one-stop center.

Reported data on employment outcomes leave important questions unanswered because important data, such as actual wage rates of job finders, is not included. Employment outcome measures for adults for PY 2001 reflect that about 76 percent of those who received training entered employment in the quarter their training ended, and that approximately 82 percent were still employed six months after employment entry. Earnings gain data (change in earnings from prior to program participation to after program participation), reflect what appears to be an increase of about \$4,000 per year. However, without knowing the actual pre- and post-program wage rates, one cannot determine the extent to which the system is helping participants achieve livable wages. Separately reported performance information for public assistance recipients<sup>vi</sup> shows comparable employment and retention rates to those achieved for all adults (69 percent and 76 percent, respectively) and earnings gains of slightly over \$4,200.<sup>vii</sup> Here again, however, without more detailed information about participant characteristics and actual wage rates, this information is of limited value. Another problem with the data described here is that while we know that between 40,000 and 50,000 adults, and another 40,000 to 50,000 dislocated workers, received WIA-funded training, we have no information about how many more adults may have used one-stop systems and core services to learn about and access training that was paid for with other funds—for example, student financial aid.

Finally, states and localities are not required to report spending in categories that match service tiers, e.g., core, intensive, and training. Thus, while WIA imposed a substantial new requirement on local areas to create one-stop systems, and provide universal access to core services, we lack information about the requirement’s fiscal impact.

## Meeting the Challenges Facing the Workforce Development System

As noted above, the experience with WIA implementation to date, and the information about the results achieved, should be viewed as preliminary, and Congress should proceed cautiously in this reauthorization. Nonetheless, based on the data that are available, immediate steps should be taken to improve and expand access to training for both adults and dislocated workers and to make it easier for providers to participate in the WIA-funded training system. Beyond these measures, our proposals principally concern the need to improve the information about the nature, quality and cost of services being provided.

The following proposals would advance these goals:

**The current sequential eligibility requirements that require the use of core services prior to intensive services, and the use of intensive services prior to the use of training services, should be eliminated as the Administration proposes.**

Under the current law, WIA provides three tiers or levels of service—*core*, *intensive*, and *training*. These services are provided sequentially, meaning that individuals must first receive core services to gain access to intensive services and similarly, individuals must receive both core and intensive services to receive training services.

While the stated intention of WIA is not to require up-front job search for all customers, state and local officials have commented that the sequential nature of service delivery prescribed under WIA sends the message that intensive and training services should be reserved for individuals who truly cannot find employment on their own. This interpretation would preclude in most cases the use of WIA training to help workers, whether between jobs or currently employed, advance to better jobs. This was surely not the Congressional intent in creating WIA; the fact the Congress authorized WIA funds to be spent on customized training for incumbent workers shows it was supportive of using federal funds to help workers advance.

Research clearly demonstrates that helping low-income adults increase their skills pays off in the labor-market, particularly through participation in job training and other post-secondary programs. Even those with lower skills can benefit from job training and other post-secondary programs, if basic education services provide a substantial numbers of instructional hours each week, close attention is paid to quality, and basic education is linked to further training and employment. The Act should be amended so that individuals can access intensive and training services based on an individual assessment of needs and strengths, regardless of whether or not he or she has participated in other aspects of the WIA program.

**Each state should be required to provide information from Unemployment Insurance wage records, including data from the Wage Record Information System, (with appropriate privacy safeguards) concerning the employment, retention, and earnings information on program participants that is necessary for training**

**providers to document to remain or become eligible as a certified training provider. Additional funds should be made available to each state and set aside to meet the cost of collecting and providing this information.**

The WIA legislation requires that eligible training providers provide program-specific outcome information for all individuals participating in their program if any WIA clients are enrolled. This includes program completion rates, the percentage that obtains unsubsidized employment, and the wages at employment placement. Requiring that these data be available matters because monitoring the employment outcomes of program participants is critical to the success of the ITA program under WIA. Simply knowing completion rates of a program would not provide the same insight into the effectiveness of the program and the employment and earnings of program participants.

Many training providers, particularly the community colleges, have commented that the employment outcome reporting requirements are costly and difficult to implement, and as a result, some have expressed concern about continuing to serve WIA clients. While we feel that it is important to maintain a set of consistent standards for training providers, DOL should help facilitate training providers' ability to obtain post-program employment and earnings data easily and inexpensively. This should include mandating in WIA that states allow matching of provider participant data with Unemployment Insurance wage records, including access for providers who are out-of-state but serve customers in multiple states. Modifications in the law need to be made to balance legitimate privacy concerns regarding earnings and education data, while at the same time providing access to data needed to assure accountability for the effective use of these public funds. This will help maintain and expand the pool of quality training providers to serve WIA clients.

**Reporting should be improved by including more specific information in the following areas:**

- **Information concerning usage of core services;**
- **More specific data concerning the number of individuals that receive each type of training, with breakdowns for the number of employed and unemployed individuals who receive each type of training;**
- **Actual post-program wage rates and hours of individuals who participate in training;**
- **Research should be funded to develop tools for assessing the effectiveness of one-stop systems and core services.**

The reporting requirements prescribed by the WIA legislation marked a major shift in the way federal job training programs were measured. By implementing the 17 core measures of performance, WIA increased the focus on program outcomes. The data available as a result of these new requirements provide useful, basic information about WIA's overall success. However, there continue to be significant gaps in the data, which hinder the ability to gain a complete picture of the WIA program.

One of the greatest gaps in the reporting requirements is that the data fail to provide information on all WIA participants. The legislation only requires states to include

registered WIA participants in their performance calculations. Since a client is typically not registered as a WIA participant until he or she exits the core service tier and moves into intensive services, only individuals that receive intensive or both intensive and training services are counted in the measures. This means that there is no required data collected on the number receiving core services or the types of service they receive, and no method for assessing the effectiveness of these services. A minimal first step in this area would be to require reporting on the number of individuals who receive core services and the types of services they receive. In addition, new legislation should authorize and fund the Department to undertake a national study of the effectiveness of one-stop systems and core services at multiple sites around the country to both develop information about their effectiveness, and develop models for performance measurement on a national basis.

A second concern is that the measures themselves have some flaws. The earnings gain measure does not provide an accurate assessment of the quality of jobs into which program participants are being placed. Simply looking at earnings increase does not provide data on actual wages and could potentially skew the way in which job placements are ultimately judged. States should be required to report on the starting wage rates and hours of training participants. These data, starting wage rates and post-program earnings levels, would provide valuable complementary data to the data upon which performance is measured, and would give program managers, policymakers, and other stakeholders a better sense of WIA services' impact on individuals' overall financial well-being.

One of WIA's stated goals is to improve access to employer-sponsored customized and on-the-job training, and to provide training services to low-wage, incumbent workers. States and localities, however, are not required to report on the extent to which these types of training services are being used. Incumbent worker training, as well as on-the-job training and customized training, is a key element of any workforce development program and is important for job retention and advancement. Given research suggesting that these types of training can be particularly effective, policymakers and advocates should know the extent to which these programs are being used. To generate information on these issues, the law should be modified to require that states report on the number of participants in each type of training service authorized by the Act, and that the numbers of participants should be provided with a breakdown showing the number who are employed while receiving training, and the number who are unemployed.

**State and local financial reports should be required to specify the amount of funds expended for training services, the amount of funds expended for intensive services, and the amount expended on maintenance of the one-stop delivery systems (including the cost of core services) in the state and in each locality.**

Another missing piece of the WIA reporting picture is the lack of cost information for each of the three tiers of service within WIA. States are required to provide quarterly financial data for each of the three WIA programs—adults, dislocated workers, and youth—but they are not required to report on the amount of money spent on core, intensive, and training services. The financial reports for PY 2000, for example, only



indicate that \$1 billion was appropriated nationally for services to adults under WIA, but does not report the amount of money spent on adult core services, adult intensive services, and adult training services. This makes it impossible for Congress, the Administration, and the public to know how much is being invested in training services, for example, compared to the other elements of the WIA program.

### **The Administration's Proposal**

The Administration's proposal includes modifications of current law regarding governance, the one-stop career center system, services for adults and dislocated workers, services for youth, performance accountability, and state flexibility/waivers. In the limited amount of time available today, I wish to focus principally on elements of the Administration's proposals concerning comprehensive adult services (including the proposal to create Personal Reemployment Accounts), and state flexibility because of the interrelationships among elements of the proposals in these areas, and because they represent the most dramatic of the numerous proposals that affect services for adults and dislocated workers.

### **Consolidated Services for Adults**

The Administration proposes to create a single funding stream by combining the currently distinct funding streams for adults, dislocated workers, and the Employment Service. These funds would be distributed based on a new, and as yet unspecified, formula. Up to 50 percent of the funds could be retained at the State level, with 40 percent distributed to local areas by a federally determined formula, and 10 percent distributed through a state-developed formula. The rationale for these changes is to simplify administration and to "...reduce current duplication and inefficiency." It is also suggested that this consolidation will improve the flexibility to integrate WIA and TANF.

Improving efficiency and reducing duplication of services are laudable goals. However, in a system that is as young as WIA, and for which so little information is available, we would urge a far more cautious approach to the changes that should be made this year. More specifically, with regard to the proposal to combine adult and dislocated worker funding stream, we are unaware of any evidence that the current structure has led to either duplication or inefficiency. As the Administration notes in its proposal, localities, with approval of the state, have had the authority to transfer up to 20 percent of funds between the adults or dislocated workers. Just a few weeks ago, for FY 2003, that transfer authority was increased to 30 percent. The Administration's proposal indicates that 30 states have made some use of the current transfer authority, but to our knowledge there is no information about the extent to which states and localities have made full use of the 20 percent authority that has been available to them.

Absent evidence of the need for broader transfer authority, the proposal to eliminate the separately designated funding streams for adults and dislocated workers is unwarranted. The proposal sets up a potentially destructive competition for limited resources at the state and local levels. Given the declining availability of training generally, the fact that

only about 84,000 to 100,000 adults and dislocated workers received training in PY 2000, the main point should not be to debate which 100,000 adults and dislocated workers get training; the main point of debate should be how to ensure that resources are available to increase the number who receive training.

With regard to the consolidation of the Employment Service and the two WIA funding streams, it again appears that the “solution” proposed by the Administration exceeds any changes needed to respond to concerns that currently are being raised or seen at the state and local levels. Observers of the WIA and Employment Service systems broadly agree that Employment Service funding and activities are and should continue to be central in the delivery of core workforce services to adults and dislocated workers. In addition, the Employment Service plays a key role in the Unemployment Insurance system by implementing the "work test" requirement for claimants. This responsibility, as well as other ES functions, including the administration of the targeted jobs tax credit, specialized veterans services, and assistance for migrants are likely to be compromised through the block granting process. More broadly, and perhaps beyond the scope of today’s hearing, the proposed elimination of the Employment Service should be seen as part of a broader and more troubling set of proposals to restructure the administration and funding structure of the Unemployment Insurance system, including the devolution of Unemployment Insurance administration to the states, and the potential substitution of Personal Reemployment Accounts for Unemployment Insurance extensions.

Concerns about lack of coordination should be addressed by more careful consideration of how to most effectively integrate one-stop services and the Employment Service, how best to align performance measures, and how to most effectively ensure that there is meaningful coordination at the governance level, where authority for the Employment Service resides at the state level, while authority for the one-stop systems reside at the local level. Issues that warrant further attention in this area include modifications to the statute that would maximize collocation of Employment Service activities and one-stop activities, and assuring an appropriate role for Local Boards in the planning and delivery of Employment Service activities. Here, as in the case of consolidation of adult and dislocated funding streams, more incremental approaches to improved coordination and administrative simplification should be considered.

### **Personal Reemployment Accounts**

The Administration’s Personal Reemployment Account proposal is not formally part of its proposals for WIA reauthorization, and PRA legislation is proceeding on a separate track from WIA Reauthorization with the Committee’s work already completed. Yet, it is difficult to fully assess the merits of the Administration's proposal on WIA without considering the effect of its PRA proposal. Thus, at the same time the Administration proposes to create a new flexible, consolidated adult funding stream, it would use significant new resources to create a whole new structure of benefits and services, with different rules concerning eligibility, benefits, and service delivery mechanisms. On this basis alone, the PRA proposal appears to run counter to the goal of reducing administrative complexity and duplication, which is the basis for the consolidated adult

funding stream proposal. And, taken on its own, the PRA proposal has significant troublesome aspects.

The proposal currently under consideration to provide \$3.6 billion in new funding for personal reemployment accounts is an effort to use an untested mechanism to accomplish several objectives, including income support, incentives to obtain employment, support services, and skill development. While there may be some appeal to making flexible funding available to meet these various needs, it seems likely that the proposal will not adequately address any of those needs on a consistent basis. Income support for an unemployed worker who cannot find work should be provided through extensions of unemployment benefits until the economy recovers sufficiently so that reemployment within the standard 26-week period becomes feasible once again. The unemployment system works effectively to provide income support to workers and their families during periods of unemployment and helps to at least partially maintain their purchasing power, which provides some stimulus for the economy. The first priority for use of these resources should be to accomplish these important goals of the Unemployment Insurance system through extensions of benefits as has been done already done on several occasions in response to the current downturn.

As noted above, there appears to have been a significant drop in the number of adults and dislocated workers receiving training under WIA, yet we know that training is a valuable tool for helping unemployed individuals improve their labor market prospects. Unfortunately, the \$3,000 cap on reemployment accounts, together with the competition among potential uses for these funds, will almost certainly undermine their usefulness in securing quality training for most recipients. Indeed, even leaving aside other uses, the \$3,000 cap is less than most jurisdictions were making available for training vouchers in a survey CLASP conducted in 2001.<sup>viii</sup> For these reasons, any funds that are not needed to provide appropriate Unemployment Insurance extensions should be made available to Local Boards to supplement existing funds for training services. These new resources would allow them to creatively deploy vouchers and other training mechanisms to meet the needs of long-term unemployed individuals, and those at risk of long-term unemployment, as part of their existing workforce strategies.

Any experimentation with multipurpose reemployment accounts should be tested using existing funds under authority granted to the Department under Section 171, or by a State with authority under Section 134(a)(3)(A)(iii).

### **State Flexibility/Waivers**

The Administration appears to be proposing to substantially expand waiver authority under the Act. Under currently law, waivers are broadly available under Section 189. However, there are a set of key statutory requirements that cannot be waived, including among others, workplace protections for participants, non-displacement provisions, grievance procedures, nondiscrimination, allocation of funds to local areas, rules governing the eligibility of participants and providers, and the rules concerning the establishment and functions of local boards. The Administration now appears to be

proposing that these statutory limitations should be removed. This is a troubling proposal. The provisions that Congress agreed in 1998 should not be waivable were viewed then, and should be viewed now, as elements that are fundamental to any system that a state or locality might establish under WIA. Any proposal to modify this list should bear a significant burden to justify the need for a change, and to ensure that the interests underlying each of these exceptions can be accommodated.

The Workforce Flexibility Plan provision (Section 192) offers to states the ability to secure the authority to grant local area waivers along lines similar to those made available under Section 189, with the same list of core provisions that a state could not waive. The proposal suggests that governors would be given broad authority to operate all Title I formula programs, adult, dislocated workers, and youth, at their discretion, and without limits vis-à-vis substate funding and governance structures. This dramatic change in current law is supported with the following assertion: “No state has requested this authority under WIA since there is a perception that the process is too bureaucratic.” However, the statute is simple and straightforward in specifying that a state needs to submit a plan to the Secretary and the plan needs to specify the process by which local areas can submit and secure approval by the state of a waiver, and the requirements of federal law that the state is proposing to waive. If the implementation of these simple provisions is perceived to be too bureaucratic, the Administration would seem to be in a position to simplify the process as appropriate, and to let states know that the Administration stands ready to work with them to help support state innovation in this area. The fact that no state has sought authority under the existing provision does not offer a basis for radically broadening the Administration's authority in this area.

Thank you for providing me with this opportunity to testify.

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<sup>i</sup> This testimony reflects ongoing collaborative work with a number of CLASP colleagues, including Abbey Frank, Nisha Patel, Mark Greenberg, and Julie Strawn.

<sup>ii</sup> The Workforce Investment Act Standardized Record Data (WIASRD) contains information about all WIA participants who receive either intensive or both intensive and training services under the Act.

<sup>iii</sup> D.C. Jobs Council, *Help Wanted: Low-Income Job Seekers Assess the District of Columbia's One Stop Career Centers* (Washington, DC: D.C. Jobs Council, June 2001).

<sup>iv</sup> Anti-Displacement Project, *FutureWorks: Roadblocks to Success. How FutureWorks Is a Dead End for Low Wage Workers. Report Summary of FutureWorks Testing Project* (Springfield, MA: Anti-Displacement Project, March 2001).

<sup>v</sup> Jennifer Blevins, *Accessing Jobs and Training in Minnesota: Workforce Center Testing Project Results* (Minneapolis, MN: Jobs and Affordable Housing Campaign, December 2001).

<sup>vi</sup> Public assistance recipients are defined as individuals who are listed on the TANF grant and/or are receiving assistance under General Assistance, Refugee Cash Assistance, Supplemental Security Income, or Pell Grants.

<sup>vii</sup> The number of public assistance recipients whose performance is measured in these data is not reported.

<sup>viii</sup> Nisha Patel and Steve Savner, *Implementation of Individual Training Account Policies Under the Workforce Investment Act: Early Information from Local Areas* (Washington, DC: Center for Law and Social Policy, May 2001). Available online: [www.clasp.org/pubs/jobseducation/ITAPreliminaryReportMay2001.pdf](http://www.clasp.org/pubs/jobseducation/ITAPreliminaryReportMay2001.pdf). The maximum amounts of ITAs for those local boards that provided information about caps ranged from \$1,000 to \$10,000, with some boards setting different caps for different types of training. Most caps were in the \$4,000 to \$6,000 range.