

Area 14 Workforce Development Board

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Use of Individual Training Accounts

Area 14 Policy 14.15-11.4

Effective: May 15, 2019

Revised: September 15, 2022



I. Purpose

The purpose of this policy is to standardize the delivery of ITAs so local workforce development areas (local areas) consistently provide training opportunities to participants leading to employment in an in-demand occupation.

II. Effective

Immediately

III. Background

A program of training services is one or more courses or classes, or a structured regimen that provides the services that are listed in 20 C.F.R. 680.200 and leads to:

1. An industry-recognized certificate or certification, a certification of completion of a registered apprenticeship, a license recognized by Ohio or the Federal government, or an associate or baccalaureate degree;
2. A secondary school diploma or its equivalent;
3. Employment; or
4. Measurable skill gains toward a credential described in paragraphs 1 and 2 of this section or employment.

To be eligible for training services, the local area or the Comprehensive Case Management and Employment Program (CCMEP) lead agency must determine whether adult, dislocated worker, or out-of-school youth participants and per wavier authority, in-school youth, are appropriate for training services. Determination of appropriateness should be done by completion of an interview, evaluation or assessment, and career planning. Assessment may include, among other things;

1. A combination of standardized tests;
2. Inventory of participant's interests, skills assessment, career exploration, and
3. Available labor market information.

Training services must be provided in a manner which maximizes informed consumer choice in selecting an eligible provider. When participants and local areas select an eligible training provider, they

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should consider providers who are eligible for financial aid to ensure best utilization of Workforce Innovation and Opportunity Act (WIOA) funds.

A. Individual Training Accounts

Eligibility information, combined with assessment information, help determine the need for training assistance. Additionally, local areas or CCMEP lead agencies must review family self-sufficiency if the ITA is provided to an adult participant age 18-24 or a youth participant. WIOAPL No. 15-09.1, Training Services for Adults and Dislocated Workers, and WIOAPL No. 15-10, Youth Program Services, provide further direction for determining appropriateness for training services for adults, dislocated workers, and youth. Limits to training services may be based on the needs of the adult, dislocated worker, or youth and identified in the IOP, individual employment plan or the individual service strategy, such as the participant's occupational choice or goal and the level of training to succeed in that goal. ITA's will be included in the IOP, IEP or ISS.

Training services for adults, dislocated workers, and youth are typically provided by training providers who receive payment for their services through an ITA. An ITA is a key tool used in the delivery of training services and is one of the primary methods through which training is financed and provided. ITAs are established on behalf of the WIOA participant to purchase a program of training services from eligible providers selected in consultation with the case manager. Additionally, the cost of training, time commitment of the participant, fees and books, tuition, and other associated costs should be considered when conducting a cost benefit analysis for the ITA.

Per WIOAPL No. 15-09.1, WIOAPL No. 15-10, and rule 5101:14-1-02 of the Administrative Code, training services for which ITAs are used shall only be delivered by providers who have met the eligibility criteria and are listed on the Workforce Inventory of Education and Training (WIET) pursuant to section 122 of WIOA. Area 14 has the ability to not use a WIET approved provider if after evaluating their program graduation rates and placement rates, Area 14 finds that they are not sufficient to place our participants on a good career path.

Training services under ITAs must be provided in a manner that maximizes informed customer choice in selecting an eligible training provider. Each local workforce development board (WDB), through the OhioMeansJobs center, must make available to job seekers the State list of eligible training providers. The local WDB may also coordinate funding for ITAs with funding from other Federal, State, local, or private job training programs or sources to assist the individual in obtaining training services. Priority consideration must be given to training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or critical jobs in the local area.

B. Registered Apprenticeship Programs and Individual Training Accounts

RA is a proven model of job preparation that combines paid on-the-job training (OJT) with related instruction to progressively increase a worker's skill levels and wages. RA is also a proven business-driven model that provides an effective way for employers to recruit, train, and retain highly skilled workers. Graduates of Registered Apprenticeship Programs (RAPs) receive

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nationally recognized, portable credentials, and in some instances their training may be applied toward further postsecondary education.

All RAPs are considered in-demand occupations and automatically eligible for inclusion on Ohio's ETP list contained on WIET. These RAPs must opt-in to the ETP list to be added, as not all sponsors are currently hiring new apprentices and may not want to be included, despite automatic eligibility. Any local ETP list, where they exist, must be a subset of the statewide ETP list. All RAPs on a statewide ETP list must be included on any local ETP lists.

ITAs may also be used to finance State-recognized pre-apprenticeship training in preparation for the formal RA training if the pre-apprenticeship program training provider has been approved as an Ohio ETP and is listed on WIET per WIOAPL No. 16-02.1, Eligible Training Providers.

C. Area 14 requirements for ITA's

Duration of ITAs

The duration of an ITA is determined by a participant's course of study. Realistic and attainable training plans must be considered. Generally, training is either short-term or long-term. Short-term training is training which is completed in 12 months or less. Short-term training is the preferred method since the goal is to attain employment quickly. However, the local areas must keep in mind the participant's career pathway, and the training and services necessary to meet the participant's goal. For instance, the classroom training portion of a Registered Apprenticeship program is typically longer than a year. However, this training is part of a career pathway involving longer training, and the apprentice is also simultaneously employed.

Long-term training is training whose length does not exceed 24 months. Four-year degree programs may be funded when the customer can document that he or she is in the last 2 years of the program (e.g., remaining hours are equal to or less than 50 percent of the total credit hours required for the degree) and is in an in-demand occupation or critical job.

The following exceptions to the 24-month limit on long-term ITA training are permitted:

1. ITA-funded training necessary to enter occupations of state strategic priority may continue for up to 48 months or up to the discretion of the county based on a county procedure letter (CPL). This is to enable and encourage the completion of baccalaureate degrees in vital career fields, such as critical jobs which directly support the health and well-being of Ohioans.
2. Because of all the benefits of a registered apprenticeship program, including an established career pathway and simultaneous employment, the classroom training portion of the Registered Apprenticeship programs may be up to 4 years in length. Area 14's registered apprenticeships will be funded for up to 4 years depending on the length set by the programs, or up to the discretion of the county (CPL).

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3. In instances where a participant is unable to complete the training program within the time frame outlined in the ITA, the ITA may be extended. While determinations have to be based on the factual circumstances of each case, some instances when more time may be warranted include, but are not limited to, those directly related to:
 - A participant's military service or military-related leave time;
 - Lack of availability of classes;
 - Cancellations of classes; or
 - Unforeseen illness (of the participant or an immediate family member of the participant). For the purposes of this policy, immediate family members include the participant's parents (including step-parents), spouse, domestic partner, and children (including step-children or children of whom the participant has been awarded custody through a court).

Funding ITAs

The cost for ITAs are determined by the average cost of training for specific in-demand or critical jobs occupations within the local area as well as the following criteria:

- a. Whether the training investment is in line with the future expected earnings of the participant;
- b. Whether the training is being provided as part of the registered apprenticeship program; and
- c. Consideration of the full cost of participating in training services, including costs for fees and books, tuition and other associated costs.

An adult, dislocated worker, or youth participant may select training that costs more than the maximum amount available for ITAs when other sources of funds are available to supplement the ITA. Area 14 program operators will complete a comprehensive assessment during their intake interview to make sure all grants and funding and scholarships have been explored prior to funding the ITA to ensure the best utilization for WIOA funds.

Maximum funding for training financed through ITAs thru Area 14

ITAs utilizing WIOA funding will count towards the participant's overall funding cap for the ITA educational training as set by the Area 14 Workforce Development Board (maximum of \$25,000 per year; maximum of \$100,000 total per training program if pursuing a baccalaureate degree or a 4-year Registered Apprenticeship). This cap is for the educational training portion. ITA for the use of incentives and supportive services utilizing WIOA funding will have a funding cap of \$10,000 per year for a maximum of \$40,000 if enrolled in a 4-year degree or Registered Apprenticeship (see Supportive Service Policy 14.15-04 for uses). OJT funding cap in located in Area 14 On-the-Job Training Policy 14.15-22.1 and is separate from the training and supportive services caps.

Any exception needed to the above allocations needs to be communicated to the Area 14 WDB Director in the form of an email to the Director explaining the extenuating circumstances including the participant's name, needs to increased allocations, total costs used already, additional costs needed, and reason the allocation needs to be increased. The Area 14 WDB director will then engage the Executive Committee, if in between quarterly board meetings, or

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the entire board if the next meeting is within an allowable time frame so as to not make the participant have to wait to enroll in training.

3. Allowable Individual Training Account Costs

ITA expenditures are costs required by the training institution to complete the training. ITA costs required to complete the training include, but are not limited to:

- a. Tuition and fees;
- b. Books;
- c. Tools;
- d. Uniforms;
- e. Tests; and
- f. Medical immunizations/tests.

ITA costs do not include any supportive services' costs related to the ITA (e.g. transportation or childcare).

Costs must be reasonable and necessary and present a sound investment of public funds.

E. **In-Demand Occupations and Critical Jobs**

To receive an ITA, a participant must select a training program that is directly linked to employment that is in high demand.

1. State In-Demand Occupations and Critical Jobs (85 Percent)

In-demand occupations were chosen using various industry- and occupation-focused measures. These measures include: projected openings; projected growth; select JobsOhio industry cluster occupations; and historic job posting data. The list of in-demand occupations will be validated or further enhanced using business data from the online Workforce Information Exchange job forecasts monthly.

Critical jobs are determined through state strategic priority and considered critical to the health and well-being of Ohioans, their families, and our communities. Some examples of critical jobs may include occupations in early childhood education, mental/behavioral health, and recovery.

Each program year, at least 85 percent of new ITA enrollments for the local area must be in an in-demand occupation or critical job as defined by the state of Ohio. Participants who have a current program year training service start date and whose ITA will carry into the next program year, will not be counted in the next program year's percentage.

Ohio's Top Jobs List includes both In-Demand Jobs and Critical Jobs. The Top Jobs link below provides access to in-demand occupation and critical jobs data:

<https://topjobs.ohio.gov/wps/portal/gov/indemand/top-jobs-list>.

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2. Local Area In-Demand Occupations (15 Percent)

The remaining 15 percent of ITA enrollments for the local area may be for occupations defined as in-demand within the local area. Some examples of local area in-demand occupations may include, but are not limited to:

- a. A local in-demand occupation in a geographic area to which the participant is willing to work or relocate;
- b. Employment associated with a regional industry sector or career pathway consortium for workforce development;
- c. A written guarantee of a bona fide job upon completion of training.

Appropriate documentation must be maintained in the case files. ODJFS will review adherence to this policy and the federal law during comprehensive monitoring visits.

IV. Reporting Requirements

Program Operators are required to maintain and report accurate program and financial information pursuant to rule 5101:9-30-04 of the Ohio Administrative Code, information regarding WIOA participants, and their activities and performance must be entered into must be entered into the online state case management system accurately and within 30 days and CFIS systems accurately and within 30 days.

V. Monitoring

The Area 14 Workforce Development Board will conduct oversight of the implementation of WIOA funded adult and dislocated worker training programs to ensure that participants enrolled in the programs are eligible, that eligibility has been properly documented and services were provided consistent with applicable policies. Program Operators are required to make available to the board and/or contracted monitors all relevant participant files, documents and paperwork. Program files will be monitored yearly unless it is determined by the board there is a need for more frequent monitoring.

VI. References

Workforce Innovation and Opportunity Act, §§ 122 and 134, Pub. L. 113-128

20 C.F.R. §§ 680.300-680.340, 680.410-420, and 680.450.

29 U.S.C. 3101 et seq.

O.A.C. 5101:9-30-04, and 5101:14-1-02.

USDOL, Training and Employment Guidance Letter No. 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Services (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules, (March 1, 2017).

USDOL, Training and Employment Guidance Letter No. 13-16, Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA), (January 12, 2017).

USDOL, Training and Employment Guidance Letter No. 41-14, Workforce Innovation and Opportunity Act (WIOA or Opportunity Act) Title I Training Provider Eligibility Transition, (June 26, 2015).

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ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-09.1, Training Services for Adults and Dislocated Workers, (January 8, 2018).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-10, Youth Program Services, (July 15, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 16-02.1, Eligible Training Providers, (May 28, 2019).