



Area 11: Local Policy

Individual Training Accounts

Purpose:

This policy provides guidance on Individual Training Accounts (ITA) and Eligible Training Providers (ETP), to standardize the delivery of ITAs so the Workforce Development Board of Central Ohio (WDBCO) consistently provide training opportunities to participants leading to employment in an in-demand occupation.

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;

Policy:

I. Adult/ Dislocated Workers

Individuals wishing to receive employment and training services funded through the adult and dislocated worker programs must meet all the following requirements:

1. Be legally authorized to work in the United States;
2. Be 18 years of age or older;
3. Be properly registered for selective service (refer to WIOAPL No. 15-04, Selective Service Registration, for details, including the list of exceptions to this requirement).

There are no additional eligibility criteria for the adult program. However, priority for career and training services funded by and provided through the adult program shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of those career services determined appropriate to obtain or retain employment.

Additional Statutory Eligibility Requirements for Dislocated Workers

In addition to the requirements listed above, an individual must also fall into one or more of the following eligibility categories as outlined in section 3(15)(A-E) of WIOA:

Category A: Terminated or Laid Off, or Received a Notice of Termination or Layoff From Employment

- Has been terminated or laid off or has received a notice of termination or layoff from employment; **AND**
- Is eligible for or has exhausted entitlement to unemployment compensation; **OR**
- Has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state unemployment compensation law; **AND**
- Is unlikely to return to a previous industry or occupation.

Category B: Plant Closure or Substantial Layoff

- Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of or any substantial layoff at a plant, facility, or enterprise; **OR**
- Is employed at a facility where the employer has made a general announcement that such facility will close within 180 days; **OR**
- For purposes of eligibility to receive services other than training services described in section 134(c)(3) of WIOA, career services described in section 134(c)(2)(A)(xii) of WIOA, or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close.

Category C: Self-Employed Individual

- Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of natural disasters; or general economic conditions in the community where the individual resides.

Category D: Displaced Homemaker

- Is a displaced homemaker.

Category E: Military Spouse

- Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty state of such member; **OR**

- Is the spouse of a member of the Armed Forces on active duty and who meets the criteria of a displaced homemaker who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

II. Youth

Students must have applied for WIOA services and have been determined by a WIOA Case Manager to be eligible for training services. 2. Students must complete an Individual Employment Plan (IEP) or, in the case of CCMEP TANF eligible youth participants, an Individual Opportunity Plan (IOP) that details the participant's skills, interests, and abilities and sets specific goals for the student to meet in order to obtain or retain employment that leads to self-sufficiency. 3. Students must choose a training program that is consistent with their skills, interests, and abilities, with the assistance of the WIOA Case Manager, CCMEP Case Manager, or partner agency. 4. Students in qualifying programs must apply for PELL, OIG, and other appropriate grants before utilizing WIOA funds. 5. After the first quarter or semester, the student must be in good academic standing and/or have maintained a "C" average in the program of study, unless a higher-grade point average is required by WIET. In the event that the student does not reach this standard, interventions, including intensive case management services, will be offered to the student. A student may not change majors and/or training providers after the ITA is signed; if the student does change majors and/or training providers, ITA funds will not be obligated for payment nor will continuation of the ITA be guaranteed.

III. Eligibility

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 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;

- a) A combination of standardized tests;
- b) Inventory of participant's interests, skills assessment, career exploration, and
- c) 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 should consider providers who are eligible for financial aid to ensure best utilization of Workforce Innovation and Opportunity Act (WIOA) funds.

IV. Maximum Duration of an ITA

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.

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.

V. Maximum Funding for Training Financed through ITA's

The cost for ITAs are determined by the average cost of training for specific in-demand 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.

The average amount of an ITA is \$3,500 with a maximum of \$15,000 over the lifetime of the award. The maximum period to use the ITA award is two years. Awards exceeding the \$15,000 or time limit specified in the policy can be awarded to a customer only if an exception is first recommended by the employment counselor and approved by the Workforce Development Board of Central Ohio. In order for an exception to be approved justification must be provided supporting the additional dollars or duration needed in order for the individual to attain or retain livable wage employment, or to make significant wage progression. When awarding an ITA, the Talent Development Specialist must first consider how to combine the ITA with other appropriate and applicable resources that may be available, such as Pell Grants, tuition assistance/exemption, employer training subsidies, apprenticeship dollars, or ITA dollars from other counties. The final ITA amount will be adjusted to reflect the financial assistance received from other sources in order to achieve the goals of the Individual Career Plan.

An adult, dislocated worker, or out-of-school 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.

VI. Allowable Costs to Complete Training Financed through ITA's

ITA expenditures are costs required by the training institution to complete the training. ITA costs required to complete the training may 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).

VII. In-demand Occupation

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 (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 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>.

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. 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.

VIII. Waiver

Each program year, at least 85 percent of new ITA enrollments for the local area must be in “in-demand” occupations as defined by the State. The remaining 15 percent of ITA enrollments for the local area may be for occupations defined as “in-demand” for the local area.

In situations where the local area may exceed the 15 percent enrollment requirement for local “in-demand” occupations, the local WDBs may request a waiver to exceed this requirement. Waivers will be approved on a case by case basis. The waiver template must be completed providing the appropriate justification for the waiver and submitted to WIOAQNA@JFS.OHIO.GOV. The subject of the email should read, "ITA Waiver Request."

Definitions:

Comprehensive Case Management and Employment Program (CCMEP): An integrated intervention program that combines the Temporary Assistance for Needy Families (TANF) program and WIOA Youth program to provide employment and training services to individuals ages 14 through 24 years.

Critical Job: As determined by State strategic priority, an occupation considered critical to the health and well-being of Ohioans, their families, and our communities

Eligible training provider: An entity that receives funding for training services through an ITA; must be included on the State list of eligible training providers and programs; must provide a program of training services; and must be one of the following entities:

1. Institution of higher education that provides a program which leads to a recognized post-secondary credential;
2. Entity that carries out programs registered under the National Apprenticeship Act (29 U.S.C. 50 et seq.); or
3. Other public or private provider of training services, which may include:
 - a. Community-based organizations;
 - b. Joint labor-management organizations; and
 - c. Eligible providers of adult education and literacy activities under Title II of WIOA if such activities are provided in combination with training services described in 20 C.F.R. 680.350.

In-demand occupation: As determined by the State or local board, an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

Lead agency: The local participating agency designated under section 5116.22 or the Revised Code to serve for a fiscal biennial period, or part thereof, as a county's lead agency for the purpose of CCEMP.

Planning region: A region comprised of two or more local areas that are collectively aligned with the region.

Pre-apprenticeship program: Programs or sets of strategies designed to prepare individuals to enter and succeed in Registered Apprenticeship programs and have documented partnership with at least one, if not more, Registered Apprenticeship programs.

Recognized postsecondary credential: A credential consisting of an industry recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.

Registered apprenticeship program: A program meeting Federal and State standards of job preparation that combines paid on-the-job training and related instruction to progressively increase workers' skill levels and wages.

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
USDOL, Training and Employment Guidance Letter No. 13-16
USDOL, Training and Employment Guidance Letter No. 41-14
ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-09.1
ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-10
ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 16-02
WIOAPL 15-11

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