

Area 11: Local Policy

Contracted and Cohort Training

EFFECTIVE: Immediately 5/20/24 (Approval of Final Policy Contingent upon Board Review on 5/29/24)

PURPOSE:

The purpose of this policy is to provide guidance and establish procedures regarding Contracted Education Training (CET) as part of comprehensive regional sector pathway programs and strategies for developing a skilled workforce and income mobility.

I. BACKGROUND

Contracted Education Training (CET) provides local boards the flexibility to contract directly with institutions of higher education or eligible training providers under certain conditions. Specifically, a local board may award a contract to an institution of higher education or other eligible training provider if the local board determines that it would facilitate the training of multiple individuals (Cohort training) in high-demand occupations if such a contract does not limit customer choice. CETs provide the same flexibility and are intended to increase education, training enrollments, and training capacity at a time when many states and educational institutions are experiencing budget shortfalls. Direct contracts with institutions of higher education or eligible training providers allow local boards to quickly design training to fit the needs of both job seekers and employers.

Please Note: CET funds must be used for occupations within the priority sectors as defined by WDBCO that led to employment opportunities enabling the job seeker to become economically self-sufficient and which will contribute to the job seeker's occupational development and upward mobility.

An Individual Training Account (ITA) is the primary method to be used for procuring training services under WIOA. ITAs are established on behalf of a WIOA participant to purchase a program of training services from eligible training providers. [WIOAPL No. 15-11.3, Use of Individual Training Accounts](#) and Area 11 Individual Training Account policy, guides the use of ITAs.

According to the Workforce Innovation and Opportunity Act (WIOA) and noted in its Final Rule at 20 CF 680.320 and [Ohio WIOAPL-15-09.1](#) the following are the circumstances under which training services can be provided, at the discretion of the WDBCO other than through an Individual Training Account (ITA).

Contracts for services may be used instead of ITAs only when one or more of the following five exceptions apply, and the local area has fulfilled the consumer choice requirements under 20 CFR 680.340:

1. On-the-job training, which may include paying for the on-the-job training portion of a registered apprenticeship program, customized training, incumbent worker training, or transitional jobs;
2. If the local WDB determines there are an insufficient number of eligible providers of training services in the local area to accomplish the purposes of a system of individual training accounts as described in the local plan. This determination process must include a public comment period for interested providers of at least 30 days and must be described in the local plan;
3. If the local WDB determines there is a training services program of demonstrated effectiveness, through criteria developed by the local board, offered in the local area by a community-based organization or another private organization to serve individuals with barriers to employment;
4. If the local WDB determines that the most appropriate training could be provided by an institution of higher education or other provider of training services to facilitate the training of a cohort of multiple individuals for jobs in in-demand industry sectors or occupations, provided the contract does not limit customer choice; or
5. If the local WDB determines a Pay-for-Performance contract is suitable and ensures that the contract will be consistent with 20 C.F.R. 683.510 (note that no more than 10 percent of the local funds may be spent on pay-for-performance contract strategies as they are defined in section 3(47) of WIOA)

II. CET POLICY AND PROCEDURES

A. CONTRACTED EDUCATION TRAINING (CET)

Per [WIOAPL 15-09.1](#), WDBCO may award institutions of higher education or Area 11 Approved Training Providers under the following conditions:

- WDBCO determines it would facilitate the training of a cohort of multiple individuals for jobs in in-demand industry sectors or occupations and
- The contract does not limit customer choice.

In addition, WDBCO may contract with an institution of higher education or an eligible training provider to procure a portion of a training class. Example: A community college has a Software boot camp with 25 training slots. WDBCO may contract with the community college for 15 of the 25 training slots; therefore, the community college will have 10 enrollments for non-WIOA students.

This flexibility allows WDBCO to select multiple high-demand training programs to serve participants. It also allows WDBCO to maximize WIOA funds while allowing institutions of higher education or eligible training providers to continue to offer course availability to non-WIOA students.

1. CET providers must meet one of the following requirements:

- Has accreditation status through an accrediting body recognized by one of the following:
 - Department of Education
 - Approval through a Federal or State agency that has oversight in a specific in-demand occupation
 - Ohio Board of Career Colleges and Schools approval
- Public or private for-profit providers of training services, which may include but are not limited to:
 - Community-based organizations;
 - Joint labor-management organizations; and
 - Eligible providers of adult education and literacy activities under title II of WIOA (in Ohio, known as Aspire) if such activities are provided in combination with occupational skills training.
- Is an eligible training provider listed on the State's Workforce Inventory of Education and Training.

2. Industry Prioritization

The following are the industry sectors prioritized for training investments recognized for the Fiscal Years 2018 – 2028. WDBCO will apply these industry sector priorities through June 2028, as below or subsequently amended. ***Please reference the Area 11 ITA policy for additional information about industry prioritization.***

- Advanced Manufacturing
- Business/Administrative Support/ Finance/Insurance Professions
- Construction and Skilled Trades
- Healthcare and Healthcare Support
- Leisure and Hospitality
- Information Technology
- Transportation, Distribution, and Logistics (Supply Chain)

WDBCO reserves the right to amend the list in response to shifting local labor market conditions and also reserves the right to approve special projects and customized training featuring training outside the list of target occupations/industry sectors.

CETs will only be considered if the training is within Area 11's priority industries

3. Employer Partners

WDBCO acknowledges the crucial importance of employer partnership in ensuring the effectiveness and sustainability of workforce training programs. As such, it is a fundamental principle of the Area 11 workforce system to actively seek and cultivate partnerships with employers to support cohorts of trainees enrolled in training initiatives.

Trainees who engage in training programs backed by employer partnerships emerge equipped with sought-after skills, valuable experience, and recognized credentials, significantly enhancing their employability and career advancement opportunities. The active involvement of employers in training initiatives significantly heightens the chances of trainees securing employment post-program completion. In addition, employers are more inclined to acknowledge and value the acquired skills and competencies, thereby bridging the gap between training and employment seamlessly.

Employer partnership also enables ongoing feedback and evaluation of training programs, allowing for continuous improvement and adaptation to the region's evolving industry needs and market demands.

Long-term partnerships with employers contribute to the sustainability and scalability of training initiatives, ensuring their continued impact and relevance in addressing workforce development needs in the Central Ohio region. **Therefore, training providers must secure at least two letters of employer support from local employers for a cohort before the beginning of a CET.**

4. CET Additional Requirements

- Training will be arranged by the OhioMeansJobs Center or Achieve More and Proposer Staff for enrolled individuals in a group (minimum 3) when it has been determined that the assessments, interests, and aptitudes of each individual support enrollment in the same training program, the timing meets each individual's service plan, and that each individual can benefit.
- A contract (Attachment A) with the training provider must be executed before the start date.
- Training will only be approved for programs that lead to industry-recognized credentials.
- Training will only be approved with Area 11 Approved Training Providers unless waived by the WDBCO Chief Executive Officer.

III. PARTICIPANT 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, out-of-school youth, and – per waiver authority – in-school youth participants are appropriate for training services.

Participants must meet eligibility requirements before being provided with training services. Eligibility for services can be found in the Area 11 Adult and Dislocated Worker Eligibility and the Area 11 Youth Eligibility Program Eligibility. Training services are available to those participants who are unable to find employment. The need and ability to benefit from WIOA funds must be established, and the participant must have the skills and qualifications to successfully complete the training program per Area 11 ITA policy.

Definitions:

In-demand industry sector: An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, and local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors as listed on the State In-Demand Occupations list or as defined by the local area per the WIOAPL No. 15-11.3.

In-demand occupation: An occupation that currently has or is projected to have 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 listed on the State In-Demand Occupations list or as defined by the local area per WIOAPL No. 15-11.3.

Individual employment plan: An individualized career service in which a plan is jointly developed and reviewed by the participant and staff that includes an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to obtain these goals and objectives.



References:

20 CF 680.320

USDOL, Training and Employment Guidance Letter WIOA 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).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-08.1, Career Services for Adults and Dislocated Workers, (June 6, 2017).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-11.3, Use of Individual Training Accounts, (January 8, 2018).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 16-02.2

Inquiries:

Kier Scott
 Director, Policy and Research
 Workforce Development Board of Central Ohio
 1650 Lake Shore Drive, Suite 110
 Columbus, Ohio 43204
 614-559-5064

Approved:

WDBCO Board	WDBCO
Signature:	Signature:
Jim Negron	Name: Lisa Patt-McDaniel
Title: WDBCO Board Chair	Title: President & CEO
Date:	Date: