



## Area 11: Local Policy

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### Training Services

**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 identify the parameters for the development of a local area Individual Training Account (ITA) policy and 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 or critical job.

#### **I. 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:

- A. An industry-recognized certificate or certification, a certification of completion of a registered apprenticeship (RA), a license recognized by Ohio or the Federal government, or an associate or baccalaureate degree;
- B. A secondary school diploma or its equivalent;
- C. Employment; or
- D. 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, out-of-school youth, and – per waiver authority – in-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;

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 that maximizes informed consumer choice in selecting an eligible training provider (ETP). When participants and local areas select an ETP, they should consider providers who are eligible for financial aid to ensure the best utilization of Workforce Innovation and Opportunity Act (WIOA) funds.

## II. INDIVIDUAL TRAINING ACCOUNT POLICY

### A. WIOA Eligibility

ITA funding is not guaranteed to any participant and is contingent on funding availability. WIOA Adult, Dislocated Worker and Achieve More and Prosper (AMP) participants may qualify for ITA funding if it is determined by WIOA staff that they meet the following criteria:

1. A resident of the City of Columbus or Franklin County or a worker dislocated from a City of Columbus or Franklin County work site. Residents not meeting this requirement may be eligible upon the review of a written exception request (*see. section IX*);
2. After an interview, evaluation or assessment, and career planning, WIOA staff have determined that the individual:
  - i. Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services only;
  - ii. Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
  - iii. Has the skills and qualifications to participate successfully in training services.
  - iv. Is unable to obtain grant assistance from other sources to pay the costs of such training or require WIOA assistance in addition to other sources of grant assistance;
  - v. Is a member of a worker group covered under a petition for Trade Adjustment Assistance (TAA) who are awaiting a determination;
  - vi. Is determined eligible and a member of a priority population if training services are provided through the WIOA adult program and/or
  - vii. Has selected a training services program directly linked to an Area 11 in-demand occupation.

### B. ITA Requirements

ITA will only be approved for training courses that are on the Area 11 Approved Training Provider list. By securing this approval, the Training Provider has demonstrated that they meet the performance standards as outlined in the *Area 11 Eligible Training Provider policy*.

Programs of study must be for careers identified on the Workforce Development Board's approved Demand Occupation List or the current State of Ohio's In-Demand Occupations upon approval of an exception at the time the training request is made.



An ITA may be used for:

- a. A certificate, an associate degree, a baccalaureate degree, a license OR
- b. The skills or competencies needed for a specific job or jobs, an occupation, occupational group, or generally, for many types of jobs or occupations, as recognized by employers and determined prior to training.

### **C. Standardized Testing Procedures for Adult and Dislocated Workers**

WIOA staff must determine, through evaluation or assessment of the individual, that the individual has the skills and qualifications to participate successfully and complete training. Including:

1. Adult and Dislocated Workers must have English reading, writing, or computing skills at or above the 6th-grade level on a generally accepted standardized test and
2. Adult and Dislocated Workers must have math skills at or above the 6th-grade level on a generally accepted standardized test or;
3. Can compute or solve problems, read, write, or speak English at a level necessary to function on the job and pass standard certification tests; or

### **D. Exemptions to Standardized Testing**

1. If the customer has been assessed in the last six months by WIOA staff.
2. If a training provider/vendor has and can provide an assessment.
3. Customers who have an associate's degree or higher.
4. Customers who are participating in employer-based training unless the employer requires it.

If a customer does not meet any of the exemptions listed above, a standardized test provided by WIOA staff must be used. Once appropriateness is determined, the individual training account (ITA) application may be completed.

**Important note: Standardized tests cannot be the sole determinant of appropriateness; there must be a comprehensive assessment to determine suitability. All training determinations and ITA assessments must be thoroughly documented and added to the customer's file.**

### III. AREA 11 PRIORITY OCCUPATIONS AND PRIORITIZED INDUSTRY SECTOR LIST

To receive an ITA, a participant must select a training program directly linked to employment in a high-demand occupation identified on the **Area 11 Priority Occupation List**. 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 and annually for the Area 11 Priority Occupation Lists.

1. Advanced Manufacturing
2. Business/Administrative Support/ Finance/Insurance Professions
3. Construction and Skilled Trades
4. Healthcare and Healthcare Support
5. Leisure and Hospitality
6. Information Technology
7. Transportation, Distribution, and Logistics (Supply Chain)

A program of training services is selected that is directly linked to the employment opportunities found to be in demand or critical. The in-demand/critical occupations list can be found in **Attachment A: Area 11 Priority Occupation List**. **Training services leading to occupations not found on this list must be supported by contracted training (Reference Area 11 Contracted Training)**, or an exception should be submitted *per sec. IX*. 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/industries.

If the individual plans to obtain their CDL, a hire letter must be produced in advance of ITA approval. The hire letter must state the employer's ability to hire the individual upon successful completion and licensing.

1. It is considered good practice for all individuals seeking an ITA to produce a hiring letter to bolster the approval of their ITA.

**Important note: WIOA staff should prioritize free occupational skills training before utilizing an ITA to fund any training service.**

**A. Priority funding for in-demand industry sectors**

The WDBCO considers the above industry sectors to be priority areas for investment in workforce development. To ensure that WDBCO is meeting the acute and long-term employment and training needs of the central Ohio region, WDBCO has established funding-specific training caps per each prioritized industry sector. The funding levels are a proportion of the entire ITA budget and are as follows:

Training	% of total training funds
Healthcare	25%
Information Technology	25%
Advanced Manufacturing	25%
Construction and Skilled Traded	
Leisure and Hospitality	25%
Transportation, Distribution, and Logistics (Supply Chain)	
Business/Administrative Support/ Finance/Insurance Professions	

**IV. REGISTERED APPRENTICESHIP PROGRAMS AND INDIVIDUAL TRAINING ACCOUNTS**

Registered Apprenticeship (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 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 are automatically eligible for inclusion on Ohio’s ETP list contained on the Workforce Inventory of Education and Training (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.

## **V. MAXIMUM DURATION OF AN ITA:**

The preferred period for funding will be two (2) training years, depending on the availability of funding, where a training year begins on the first day of training and runs for twelve (12) consecutive months. This time restriction may be extended upon approval of the WDBCO with proper documentation illustrating a need for more time to complete the program,

The ITA will not cover a bachelor's degree unless the recipient has successfully completed at least six full-time semesters or nine full-time quarters. The recipient can complete the degree within the preferred two (2) year training period. The participant must provide a transcript and a signed plan-of-study from the institution documenting that they can complete the degree requirements within the two-year time limit.

The ITA will not cover an associate degree unless the recipient has successfully completed two (2) full-time semesters, or three (3) full-time quarters AND the recipient can complete within the preferred two (2) year training period. The participant must provide a transcript and a signed plan of study from the institution, documenting that they can complete the degree requirements within the two (2) year time limit.

The ITA may cover training for up to one year for a participant holding a bachelor's degree for upgrade purposes if the current diploma does not lead to direct employment.

## **VI. 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 Columbus, MSA as well as the following criteria:

1. Whether the training investment is in line with the future expected earnings of the participant;
2. Whether the training is being provided as part of the registered apprenticeship program; and
3. 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 only be awarded to a customer if an exception is first recommended by the Director of Career Services and approved by the Workforce Development Board of Central Ohio.

For an exception to be approved, justification must be provided supporting the additional dollars or duration needed for the individual to attain or retain livable wage employment or to make significant wage progression. When awarding an ITA, WIOA staff must make reasonable attempts 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 to achieve the Individual Career Plan goals. An adult, dislocated worker, or AMP 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.

## VII. 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:

1. Tuition and fees;
2. Books;
3. Tools;
4. Uniforms;
5. Tests; and
6. Medical immunizations/tests.

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

## VIII. PARTICIPANT RESPONSIBILITIES

### A. Professional Behavior and Honesty

The participant is expected to act professionally and respectfully at all times while communicating with the training provider and career services staff. A participant must sign the **Area 11 Rights and Responsibilities Form** in order to be considered for an ITA. The participant is also expected to be honest with their Amp Coach or Talent Development Specialist, disclosing any potential barriers to completing a training program and finding a job in the field (ex. a felony conviction, unreliable transportation, etc.) Failure to do so may result in termination of the ITA funds and, potentially, termination from the WIOA program. The participant may also be asked to reimburse the WIOA program for ITA funds already expended.

### B. Grade Point Average and Attendance

Participants must maintain the equivalent of a 2.0 or higher on a 4.0 scale, if applicable. Failure to maintain this average may result in the termination of the remainder of the ITA funds. The participant is expected to attend every class and miss no more than the allowed number of absences by the training provider. If a participant quits their training program or fails to attend as required, he or she may be required to reimburse the amount of funding received.

## IX. POLICY EXCEPTIONS:

Under limited circumstances, WDBCO may grant exceptions to requirements within this policy. Requests for exceptions may be submitted to [Kscott@wdbco.org](mailto:Kscott@wdbco.org) (Adult/Dislocated Worker Programs) or [Ljackson@wdbco.org](mailto:Ljackson@wdbco.org) (AMP). Requests should include the following:

1. The specific policy requirement for which an exception is being requested;
2. A clear summary of the exception being requested and the reason for the exception; and
3. The Participant ID of the participant(s) for which an exception is being requested.

Exception requests will be reviewed based on their allowability under WIOA and any other applicable legislation, regulation, and policy/guidance. WDBCO will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

### **Definitions:**

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**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 (ETP):** 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.

**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:**

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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); and, TEGL 13-16, Change 1 (May 17, 2021).

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).



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