

South Central Ohio Workforce Partnership

Area 20/21 Workforce Development Board (WBD)
Individual Training Account and Supportive Services Policy
Effective: July 1, 2017
Revised: May 24, 2023



I. Purpose

The purpose of this policy is to standardize the delivery of individual training accounts (ITA), so the local workforce development areas consistently provide training opportunities to participants leading to employment in an in-demand occupation. This policy will also establish guidance for the local areas in delivering supportive services to participants enrolled in Workforce Innovation and Opportunity Act (WIOA) funded programs and activities.

This policy and all requirement herein, unless otherwise stated, apply to participants in youth, adult, and/or dislocated worker programs.

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

IV. 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.

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 postsecondary 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.

Follow-up services: Activities to monitor participants' success during their transition to employment and further education and to provide assistance as needed for a successful transition.

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.

Participant: A reportable individual who received services other than self-service, after satisfying all applicable programmatic requirements for the provision of services, such as having an eligibility determination completed by local WIOA staff.

Participation: The point at which the individual has been determined eligible for program services and has received or is receiving a career or training service, other than basic career services, and is the point at which an individual is to be included in calculations for performance measures.

Supportive services: Services that are necessary to enable an individual to participate in activities authorized under WIOA.

V. Consideration for ITA and Supportive Services

If a participant is interested in applying for WIOA funds, he or she must be working with a WIOA case manager through an OhioMeansJobs center for coordination and access of services.

1. ITA consideration

- a. If a participant does not have a high school diploma or Graduate Equivalency Degree (GED), they will be referred to a local GED Program, but this does not preclude them from receiving training. A participant may be assessed on reading and math on the Test of Adult Basic Education (TABE) or equivalent assessment test. Assessment outcomes will be reviewed based on the skill level requirements needed to successfully complete a training program.
- b. An application must be completed for a participant once the WIOA case manager has determined the appropriateness of an ITA. Upon submission, a review committee will review the application. The application must be received no later than two weeks prior to the start date of training for approval; failure to submit within the required timeframe may delay the start date of training, if approved.
- c. All ITAs must be reviewed annually on a case-by-case basis. Re-evaluation of the individual employment plan is required, and appropriate action steps must be taken to foster responsibility, accountability, program completion, and self-sufficiency.

2. Supportive services consideration

- a. WIOA funded programs are not entitlement programs. Although a participant may be eligible for the WIOA program, WIOA case managers must weigh all factors before authorizing expenditures for supportive services.

- b. WIOA case managers will adhere to guidance in the WIOA, as well as state of Ohio guidance in WIOAPL 15-8.1 and 15-10 in the delivery of supportive services for participants.
- 1) Adult and Dislocated Worker supportive service guidance can be found in WIOAPL15-08.1 (Career Services for Adults and Dislocated Workers).
 - i. Supportive services are designed to provide a participant with the resources necessary to enable their participation in career services. Supportive services may include but are not limited to:
 - Assistance with transportation;
 - Assistance with child care and dependent care;
 - Linkages to community services;
 - Assistance with housing;
 - Needs-related payments;
 - Assistance with educational testing;
 - Reasonable accommodations for individuals with disabilities;
 - Referrals to health care;
 - Assistance with uniforms or other appropriate work attire and work-related tools;
 - Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes;
 - Payments and fees for employment and training-related applications, tests, and certifications; and
 - Legal aid services.
 - ii. Referrals to supportive services are career services that may be available to adults and dislocated workers through the workforce development system.
 - iii. Supportive services may only be provided to participants who are in career or training services, to participants who are unable to obtain supportive services through other programs providing supportive services, and in a manner necessary to enable individuals to participate in career and/or training services.
 - 2) Youth supportive service guidance can be found in WIOAPL15-10 (Youth Program Services).
 - i. Supportive services for youth may include but are not limited to:
 - Linkages to community services;
 - Assistance with transportation;
 - Assistance with child care and dependent care;

- Assistance with housing;
 - Needs-related payments;
 - Assistance with educational testing;
 - Reasonable accommodations for youth with disabilities;
 - Referrals to health care; and
 - Assistance with uniforms or other appropriate work attire and work-related tool costs
- ii. Supportive services may be provided to youth both during participation and after program exit.
- c. Providing supportive services to youth participants that have successfully completed the activities and programs in their plan is allowed, provided that the youth participant is also participating in providing required information during the follow-up period (employment information, training information, etc.). Each WIOA case manager must make the determination on whether to incorporate these services into an individual's plan. Adult and Dislocated participants are not entitled to follow-up supportive services.

VI. In-Demand Occupations

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

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."

VII. Duration of ITAs and Supportive Services

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 participant can document that he or she is in the last two 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.

There may be instances where a participant is unable to complete the training program within the timeframe outlined in the ITA. These circumstances include but are not limited to military service or leave time, lack of availability of classes, cancellations of classes, and/or unforeseen illness of the participant or a close family member of the participant.

VIII. Funding for ITAs and Supportive Services

The maximum annual tuition and supportive services is \$9,500 from July 1 to June 30.

Training services must maximize the best utilization of WIOA funds. When training or education is available from more than one provider, the provider with the lowest overall cost shall be the provider of choice unless a more expensive provider will have a more favorable outcome for the participant (e.g., if a participant will be more likely to attend classes at a closer provider or if a provider better meets the needs of the participant/local area). WIOA case managers must review the performance of a provider to determine whether the training provider meets established local program and cost requirements. If a training provider does not meet the performance requirements, WIOA case managers may choose not to use the provider. Criteria to be considered for evaluation may include but is not limited to ability to accept financial aid and grants, availability of student support, graduation rates, placement rates, and wage rates of the graduates from the institution.

ITA expenditures are restricted to those costs required by the training provider to complete the training. Allowable ITA costs may include but are not limited to tuition and fees, books, tools, uniforms, tests, and medical immunizations/tests. ITA costs do not include any supportive services costs related to the ITA.

A comprehensive assessment of the cost of the ITA, which involves accessing other grants or funding, including Federal Pell Grants, Trade Adjustment Assistance (TAA), and scholarships, must be conducted to ensure best utilization of WIOA funds. All available financial aid resources must be utilized to minimize any out-of-pocket expense to the participant. Any award letters must be demonstrated or applied prior to the award of ITA funding.

Supportive services costs include mileage, car repair, employment-related needs, and other miscellaneous services. WIOA funds shall not be used for childcare or needs-related services.

1. Mileage must be submitted within 30 days of the travel date(s) and will be reimbursed as follows:
 - a. Round trip up to 25 miles: \$10 per day
 - b. Round trip up 26 to 50 miles: \$15 per day

- c. Round trip over 51 miles: \$20 per day
- 2. Transportation expenses will be permitted as follows:
 - a. An individual job seeker will be permitted \$20 per week if verification of an interview is provided.
 - b. An individual who has obtained verifiable employment may be permitted a gasoline card/voucher for the first four weeks of employment. The amount of the gasoline card/voucher will be based upon the mileage reimbursement rates above.
 - c. Car repairs are limited to \$1,200 per year. Prior to a purchase and/or a repair, the participant must obtain approval of supportive services from their WIOA case manager. Prior to any approval, the WIOA case manager will verify the individual's participation in a WIOA program and the amount of supportive services funds remaining. Any request for reimbursement on services that did not receive prior approval may be denied.

Participants may access WIOA funds from any of the five counties; however, funds are restricted to residents of Area 20 only.

While it is not the intent of Area 20 to alter the amount of its ITA and supportive services policy, there may be extraordinary occasions in which the funding amount must be increased, decreased, or suspended based on available funding and/or program enrollment. Any exception to this policy shall specifically be reviewed and approved by the program manager. Sufficient documentation shall be maintained in the case file(s) as to why an exception occurred.

IX. Participant Performance

A minimum GPA of 2.0 in training or high school or GED program is required; probation if participant falls below. Participant will be given one quarter or term to raise to minimum with continued funding; funding will be lost if participant fails to raise to 2.0 or above at end of the probation period. Extenuating circumstances may be considered on a case-by-case basis.

X. Reporting Requirements for ITAs and Supportive Services

WIOA case managers 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 the state workforce case management system and CFIS systems accurately and within 30 days.

The Workforce Development Board will conduct oversight of the implementation of WIOA funded 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. WIOA case managers 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.

XI. References

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

20 CFR Parts 603 et al.

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).

Ohio Administrative Code rule 5101:9-30-04, Mandated Use of Ohio Workforce Case Management System (OWCMS).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-08.1, Career Services for Adults and Dislocated Workers, (July 1, 2015).

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. 15-11.1, Use of Individual Training Accounts, (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, Eligible Training Providers, (November 10, 2016).