

**Individual Training Account (“ITA”) Policy and Procedures
for the
Adults, Dislocated Workers, and CCMEP Youth of the
Northeast Ohio Consortium Council of Governments
Workforce Innovation and Opportunity Act Policy C-11**

I. Purpose.

The Individual Training Account (“ITA”) Program is administered by the Area Workforce under the authorization of the Workforce Innovation and Opportunity Act. This policy is drafted with the intention that it be interpreted consistent with all applicable federal and state laws, regulations, and policies, issued by ODJFS.

Training services through the provision of ITAs may be provided to adults, dislocated workers, and in-school and out-of-school youth ages 16-24, (pursuant to a waiver granted by the Department of Labor in December of 2017), for ages 14-15 See 20 CFR 681.550.

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 training providers selected in consultation with the case manager. For the Area to provide an ITA, all of the following must generally occur:

- the participant must be eligible as defined by this and other Area policies;
- the training sought must be in a state-defined industry or occupation that is considered in-demand by the state of Ohio or the Area/Sub-Area;
- the training sought must be believed in good faith to be able to make the participant self-sufficient and unlikely to need additional future public assistance;
- considering all factors, including a cost-benefit analysis, the training must be deemed an appropriate service for the participant seeking the training, and a good investment of limited public funds.

For the specifics of the same, see the remainder of this Policy.

II. Effective Date.

The initial effective date of this policy is August 5, 2015. Subsequent revisions were adopted on or about September 5, 2018.

III. Background.

Under the Workforce Innovation and Opportunity Act, the use of ITAs are an allowable form of training for adults, dislocated workers, and youth pursuant to terms and conditions set forth by the Area Workforce. This policy is intended to establish those terms and conditions.

IV. Terms and Conditions for Providing an Individual Training Account.

A. What are Individual Training Accounts (ITAs)?

An ITA is a program of training services in 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.

B. Eligibility for ITAs.

Pursuant to section 134 (b)(3)(A) of WIOA, training services, including ITAs may be provided to Adult Workers, Dislocated Workers, and In-School (pursuant to DOL waiver granted in December of 2017) and Out-of-School CCMEP WIOA and/or TANF eligible and enrolled Youth, ages 16-24.

The following must occur in order for an Adult Worker, Dislocated Worker, and In-School or Out-of-School Youth to be deemed able or eligible to receive an ITA:

1. Participant Eligibility Must Exist. The participant must be determined to be an eligible Adult Worker, Dislocated Worker, and In-School or Out-of-School Youth pursuant to federal, state, and local laws, regulations, and policies.
2. Eligibility plus Criteria contained within Area Policies must all be met. This includes but is not limited to Income Eligibility, which must exist for Adults and In-School and Out-of-School Youth.
 - a) Income Eligibility for Adults and In-School or Out-of-School Youth older than twenty-four (24) years of age. These participants must be able to satisfy that s/he is not self-sufficient according to the Area's individual self-sufficiency policy. **See Policy C-03.**
 - b) Income Eligibility for Adults and In-School or Out-of-School Youth twenty-four (24) years of age or younger. These participants must be able to satisfy that s/he is not self-sufficient according to the Area's individual self-sufficiency policy (see Area Policy C-03), and that s/he is not self-sufficient according to the Area's family self-sufficiency policy. **See Policy C-03.**
3. Provision of Two Condition Precedent Services.
 - a) The participant must have an account developed in his/her name in OhioMeansJobs.com.-And-
 - b) An Adult or Dislocated Worker must have developed on their behalf an Individual Employment Plan ("IEP"); a CCMEP Youth must have developed on their behalf an Individual Opportunity Plan ("IOP"), so staff can obtain

enough information to determine the appropriateness for training services of an individual participant. If an IEP or IOP is developed on behalf of a participant, s/he must be registered and enrolled into the OWCMS system within thirty (30) days following the drafting of the same, if any other individualized career services are provided or are to be provided in the future.

4. As part of the ITA selection/determination process, the Sub-Area provider staff have been determined that the participant:
 - a) is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from their previous education and employment through career services;
 - b) is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
 - c) has the skills and qualifications to successfully participate in the selected program of training services.
5. Selects a program of training services that are directly linked to the employment opportunities in the local area, or the planning region, or in another area, to which the adults or dislocated workers are willing to commute or relocate.
6. Are unable to obtain other grant assistance for training or require assistance beyond the assistance made available under other grant assistance programs, including Pell Grant funds.
7. The provision of the training services is appropriate. **See Area Policy C-04.**
-AND-
8. Priority of Service Policies.
 - a) Priority for the Adult Program. Where the Sub-Area provider does not have sufficient funds to pay for the entire group of otherwise eligible Adult Worker applicants seeking training assistance using Adult grant funds in a single batch of applicants under consideration, priority shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient, first. **See Area Workforce WIOA Policy C-08.**
 - b) Priority for all other Programs (Dislocated Worker and Youth). Where the Sub-Area provider does not have sufficient funds to pay for the entire group of otherwise eligible Dislocated Worker or Youth applicants seeking training assistance using Dislocated Worker or Youth grant funds in a single batch of applicants under consideration, priority shall be given to those with the highest assigned rating scores. The assigned rating scores will be based upon a combined score between 0 and 10, with 0 being the lowest and 10 being the highest assigned by the Sub-Area provider staff.
 - (1) A score of 0-5 will be assigned per applicant based upon the type of recognized postsecondary credentials that are being sought, and comparatively how in-demand those credentials are within the Area's in-demand industries and/or occupations.
 - (2) A score of 0-5 will be assigned per applicant based upon the appropriateness of the training for the individuals, and comparatively how likely the individual is to succeed in completing

the training, and gaining self-sufficient employment following the same.

C. **Miscellaneous Training Requirements.**

1. Documentation.

The case files for adults, dislocated worker, and youth participants must document the participant's eligibility for training services and explain how this determination was made. In addition to eligibility, appropriateness, and a number of other issues must be considered and addressed. **See Area Workforce WIOA Policy C-01 through C-12.** It is important that WIOA staff gather enough information, by whatever means, be they through an interview or through career services, to justify the need for training services.

D. **In-Demand Linkage.**

Training services provided shall be directly linked to an in-demand industry sector or occupation or a high potential for sustained growth in the local Workforce area or planning region. To receive an ITA, a participant must select a training program that is directly linked to employment that is either considered high demand or considered critical as identified by state strategic priority as follows:

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

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. Some examples of critical jobs may include those outlined by RecoveryOhio that educate employers about hiring individuals in recovery and addressing substance use in the workplace, as well as, children's initiatives focused on pediatric mental health.

Each program year, at least 85% 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.

The link below provides access to in-demand occupation and critical jobs data: <https://topjobs.ohio.gov/wps/portal/gov/indemand/list>.

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

The Area Workforce has the authority to also establish what positions of employment are in-demand either by establishing a list, or through the real time intelligence

developed by its providers. Of the OJT placements made within a program year by a provider, a maximum of fifteen percent (15%) of those placements must be made within occupations that are deemed by the Area Workforce to be within in-demand.

If the Area Workforce establishes a list of occupations it deems to be in-demand that are not provided for within the State of Ohio's list, it will be provided to each Sub-Area provider, and the Sub-Area providers may use this list for engaging in placements.

In addition to, or in place of a list prepared by the Area Workforce, providers are also permitted to use their discretion in determining whether a position is in-demand on a case-by-case, individual basis. Some reason why a provider may deem a position to be an in-demand occupation may include, but are not limited to, the following:

- a) Any position of employment associated with a regional industry sector or career pathway consortium developed and recognized by the Area/Sub-Area.
- b) Intelligence developed by the Area's WIOA staff, including staff involved in placements, and/or business services has established that the position is currently in demand within the Area. This could include intelligence regarding new businesses established in the Area, expansion by current businesses, a large number of retirements in an occupation that need to be replaced, a large influx of job position postings for a particular occupation, etc.
- c) Any position of employment for which an employer has entered into a written agreement promising to hire an individual after s/he completes an ITA, or for which an employer promises to continue employment while the individual pursues a registered apprenticeship, shall be considered a per se locally in-demand occupation, which are allowable for 15% of the total ITAs commenced each program year.

The provider's staff will document within the case file of each individual placed within an OJT with a position that is deemed to not be on the State's "in-demand" list the reasons for which it determined the position of employment to meet the local's reasons for considering the position of employment to be in-demand at the time that the placement is made.

Should a provider have a need or desire to go over the fifteen percent (15%) maximum threshold, it must notify the Area Workforce Director, who will advise the provider whether it can or cannot make placements in excess of the fifteen percent (15%) maximum threshold. The Area Workforce Director will manage this request by either seeking relief from other providers within the Area who are below their fifteen percent (15%) threshold, or by alternatively successfully petitioning the state to exceed the fifteen percent (15%) threshold. Waivers by the Area and by the state of Ohio 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 will read, "ITA Waiver Request."

3. Eligible Training Providers.

a) State Minimal Criteria.

Training services shall only be provided by providers who have met the criteria to be eligible and have been identified as being on the State of Ohio's list of eligible providers of training services pursuant to section 122 of WIOA, and pursuant to any requirements set forth within **Area Workforce WIOA Policy C-11**.

b) Local Area or Sub/Area Criteria.

Pursuant to ODJFS policy, the Area and/or its Sub-Areas may implement evaluation and performance criteria for those training providers and programs, which the State and/or local area has approved to be on the statewide Eligible Training Provider (ETP) list contained on WIET. If the Area or Sub-Area develops those criteria, they will be reduced to writing and posted on the Area or Sub-Area's website along with a copy provided of the same made available to any provider who has entered into an ITA with the Area during the year prior to the development of those criteria. Criteria to be considered for additional 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.

In addition, should the Area or Sub-Area determine at any time that an Eligible Training Provider should not be eligible to receive students being provided with an ITA based upon its experiences with an ETP, and/or based upon objective empirical data gathered by the Area or an independent source including evaluation and/or performance criteria listed above, the Area and/or Sub-Area may choose to disqualify the Eligible Training Provider. Criteria to be considered for disqualification may include, but is not limited to, unacceptable behavior associated with invoicing, refunding, etc., the ability to accept financial aid and grants, availability of student support, graduation rates, placement rates, and wage rates of the graduates from the institution.

Should the Area or Sub-Area disqualify an Eligible Training Provider, the Area and/or Sub-Area must notify the ETP in writing of the disqualification and the reason(s) for the same. The ETP upon the provision of notice, will have five (5) business days in which to submit a request to appeal the disqualification. The ETP will be offered a chance to meet with the Area/Sub-Area entities that disqualified it as part of an informal resolution process. During that informal resolution process, all sides will have a chance to discuss the issues that resulted in the disqualification to try to resolve the same. Should the informal resolution process result in a resolution acceptable to all parties to the same, a written memorandum of resolution shall be written and signed by all parties. Should the informal resolution process fail to result in an agreeable resolution, the ETP may request that the Area/Sub-Area appoint a hearing officer not associated with the Area or Sub-Area to make a final determination of whether the ETP should be disqualified.

4. Informed Consumer Choice.

Training services shall be provided in a manner which maximizes informed consumer choice in the selection of an eligible provider of such services. Each Area Workforce OhioMeansJobs center shall make available the list of eligible providers of training services and accompanying performance information to the extent it has been made available by the State of Ohio. Based upon the available information, participants will be asked to make informed workforce decisions with the assistance of Workforce staff.

5. Type and Length of Training Permitted.

The Sub-Area providers may approve ITAs for any program of training services that leads to recognized post-secondary credentials, industry-recognized credentials, and/or a degree.

a) College level programing.

Except in the case or registered apprenticeship programming, providers will only allow individuals to pursue a post-secondary associate degree, or post-secondary studies that are the equivalent of an associate degree or results in a certificate, that is deemed to be a benchmark that is equal or less than that of an associate degree. An associate degree equates to roughly two (2) years of college level post-secondary studies, regardless of whether the period of time to complete the education is more or less than that of two (2) years.

Additionally, funding may be considered for college level programs under the following conditions:

- a) Satisfaction of a certificate or degree is required upon completion.
- b) Participants must agree to and sign the Sponsorship/ITA agreement.
- c) Participant must agree to job placement assistance upon the completion of training.
- d) An ITA may be issued based upon the following criteria:
 - (1) Participants that completed the majority of their coursework towards a bachelor or master level program [one year from completion with a GPA of 2.0 or better for bachelor level programs and a GPA 3.0 or better for graduate level programs.
 - (2) Participants must complete within 104 weeks including the summer sessions.
 - (3) Participants who have completed previous coursework, with an overall GPA less than 2.0, will be placed on academic probation for the 1st sponsored semester and evaluated each semester for future funding. A participant must obtain a GPA of 2.0 for any sponsored semester.

The Area recognizes and allows for short term, mid-term, and long-term training pursuant to the terms and conditions set forth herein. The duration of an ITA is to be determined by a participant's course of study.

Short-term training for this policy is defined as training which is completed in twelve (12) months or less. Short-term training, especially for programs that are six (6)

months are less is the preferred path for training because the goal is for program participants to obtain employment quickly, and because those dislocated workers receive a maximum of twenty-six (26) weeks of unemployment.

Long-term training for this policy is defined as training which is completed between twelve (12) and twenty-four (24) months of time. Long-term training does not exceed 24 months.

The only exception to the limit of a maximum length of training of twenty-four (24) months is apprenticeship training. 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. For this program, the local areas may fund the full length of the training.

There may be instances where a participant is unable to complete the training program within the time frame originally outlined in the ITA, and 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) A participant's military service or military-related leave time;
- b) Lack of availability of classes;
- c) Cancellations of classes; or
- d) 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 who the participant has been awarded custody of through a court).

6. Limits on Training.

a) Per Year Limitations.

\$8,000.00 maximum with the following exceptions:

- (1) Information Technology sector for in-demand occupations where the ITA maximum amount will be **\$10,000.00**;
- (2) Manufacturing sector for in-demand occupations where the ITA maximum amount will be **\$10,000.00**;
- (3) Health Care sector for in-demand occupations where the ITA maximum amount will be **\$10,000.00**;

b) Per ITA Limitation.

Providers may not incur and/or pay for expenses associated with a single ITA training in an amount in excess of **Sixteen Thousand and 00/100 Dollars (\$16,000.00)** for any one participant over the course of the pursuit of any one post-secondary credential, industry-recognized credentials, and/or a degree, unless it advances a career in one of the three (3) industry/occupation exceptions identified herein. An ITA that advances a career in one of the three (3) industry/occupation exceptions identified may not exceed Twenty Thousand and 00/100 Dollars (\$20,000.00) for any one participant.

Exceptions to the financial maximum may also be made for training requests in-demand occupational areas that incorporate learn-and-earn opportunities such as apprenticeships or Board authorized special pilot programs. Additional funding may be available (i.e., TAA, VSTP, TANF, HUD E&T) and will be approved based on each source's established provisions.

Both the per year limitation and the per ITA limitation may be exceeded if the manager of the Sub-Area Provider and the Executive Director for the WDB jointly agree to waive the same, on a case-by-case basis. The Area does not expressly prohibit an individual being approved for more than one lifetime ITA, or from an ITA exceeding the limitations set forth herein. However, the Sub-Area providers have wide discretion under the **Area's Policy on Appropriateness (Policy C-03)** to determine when to approve or deny training requested as appropriate or inappropriate.

7. Provider's Discretion of How Much, and/or What Percentage to Contribute Towards the cost of an ITA Training Program.

Each Sub-Area provider has the authority to negotiate with each individual regarding what percentage of the ITA that they will pay for and reduce the results of that negotiation to writing within the ITA itself so long as they do not exceed a one hundred percent (100%) reimbursement rate. Each provider is encouraged to either set its own lower limits, or to maximize the use of its funding by selecting a reimbursement rate that makes the most sense on a case by case basis, so long as its rates do not exceed the limits provided for above. In determining what percentage of the ITA to pay for, Sub-Area providers may take into consideration some, or all of the following criteria:

- a) Participant's need.
- b) The relative cost of the training program compared to other available, less expensive appropriate training programs. As part of this criteria, a Sub-Area provider is permitted to limit that amount it will pay or contribute towards the education of a participant as part of an ITA, to the amount of the least expensive of the tuitions for the educational/training providers being considered by the participant. This would mean that a participant would have to pay the remaining cost of tuition. This permits a participant to have a choice as a consumer of which educational provider to utilize, and at the same time allows the Sub-Area to maximize usage of its limited ITA budget.
- c) The amount of funding that the provider has compared with the provider's projected need to have funding last for the remainder of the year to continuously be able to provide for training.
- d) Special needs of the participant.
- e) Are all costs reasonable and necessary and are the costs a sound investment of public funds. **See also the Area's Appropriateness Policy C-03.**

8. ITAs are Agreements Between the Educational Provider and the Workforce Area.

Tuition and other payments on behalf of program participants must be made directly to the training facility as part of the ITA voucher. At no time may payment be made to a program participant.

No ITA payment to a school can result in a refund to the participant/student.

9. Financial Aid Considerations.

- a) An individual must demonstrate that they have the financial resources to support themselves while in training, be suitable for the training referral, job ready by the completion of training, appropriate for employment by the end of the training, and able to achieve competency levels required by the targeted employment occupation. After the completion of occupational training, if the participant is not employed, he/she is required to continue job search activities.
- b) All participants shall apply for the Pell Grant and/or other Federal/State Grants if the training desired qualifies for these types of grants. Depending on need and the availability of funding, Pell funds may be combined with other funding (i.e., TAA, veterans, TANF, HUD E&T, incumbent worker including, but not limited to, workers effected by potential layoff prior to official notice) to cover total expenses. A participant must apply for Pell funds prior to the beginning of training and submit confirmation of the application.
- c) A finalized Student Aid Report (SAR) as well as a copy of the final award determination must be presented to the Sub-Area provider when confirmation of all award amounts is available. The final amounts may result in an ITA amendment (i.e. reduction in ITA award amount) as Area 19 funding is the payer of last resort. 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. This shall mean where there are other funds available to pay for the cost of the ITA, they will be considered, and the amount of the ITA authorized by the Sub-Area provider shall be the remaining cost of tuition after all grants, financial assistance and other scholarships are first applied to the cost of tuition. The provider shall make sure that the participant utilizes all financial aid resources available to minimize any out-of-pocket expense to the participant.
- d) A participant may enroll in WIOA-funded training while his/her application for a Pell Grant is pending as long as the Sub-Area provider has made arrangements with the training provider and the WIOA participant regarding the allocation of the Pell Grant if it is awarded. The training provider must reimburse the Sub-Area the WIOA funds that were used to underwrite the tuition covered by the Pell Grant. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses.

10. Applicant issues.

- a) Applicants who have defaulted on a student loan.

Program applicants and participants who have defaulted on Student Loans may be considered for ITAs only if they have made a good faith demonstration with documentation to the Sub-Area provider that they have made arrangements with the lender to engage in a repayment schedule, and repayment on that schedule has commenced.

- b) Applicants who previously abandoned workforce training.
Program applicants who started program training but did not finish the same for whatever reason, may be disqualified by the Sub-Area provider under the appropriateness policy for future program training. If the abandonment results in the Sub-Area incurring non-refundable expenses, the Sub-Area has the right to insist upon the applicant repaying the monies as a condition to receiving additional training.
- c) Applicants who have previously received paid programming assistance.
Program applicants who have received paid programming assistance before, may be denied a second chance at training by the Sub-Area provider in order to reserve limited programming funds for another individual that is in need of training assistance.
- d) After funds have been allocated, any course change(s) must be communicated to the Sub-Area provider. In addition, a written request for approval of the course change(s) must be submitted by the participant/student to the appropriate staff before any such action is taken. Finally, approval must be granted, in writing, prior to the change(s) taking effect. Failure to notify Sub-Area staff and receive written approval may result in the reduction and/or elimination/cancellation of the ITA.
- e) Sub-Area provider has sole discretion to award or deny assistance.
The Sub-Area provider has sole discretion in determining whether to provide or deny training based upon an application of the appropriateness policy to the applicant's situation on a case-by-case basis.
- f) The Area/Sub-Area provider reserves the right to seek restitution and damages in cases of misrepresentation, fraud, noncompliance or abuse of funds.

11. Strategies for achieving positive outcomes.

Provider staff shall contact the participant personally, that is, face to face, telephone, email, etc. to gauge progress and offer additional assistance and encouragement. The results of these contacts must be recorded in the participant's case notes.

Provider staff shall encourage the participant to enroll in any career transition service available at the educational agency, especially during the six (6) months prior to graduation/completion.

12. Participation Requirements.

Participants are required to attend school continually from fall through spring sessions. Summer session attendance is encouraged. Waivers from the credit hour norm may be considered at this time (Military Reservists and National Guard personnel that are called to active duty may be exempt from this participation requirement). Other

participants may be exempt from the participation requirements based upon circumstances beyond their control.

In most cases, participants should enroll as full-time students, taking as many required courses as possible for each session, but not less than twelve (12) credit hours per session. Various factors such as: age, health, career goal, work schedule, etc., may indicate a more appropriate course load to be higher or lower than the standard in certain instances.

Course work must be only those courses necessary for completion of the degree/certificate requirements, or those courses needed to achieve a specific skill level or competency recognized by employers, as established by the educational agency and monitored by staff.

Clients requesting funding for training programs which have specific acceptance criteria, and/or limited enrollments each year, such as truck driving, must present an official letter of acceptance and a written offer of employment upon successful completion of the program.

13. Onset of Allowable ITA costs.

All payment for financial assistance for training will only be permissible for training received **ON OR AFTER** the determination of the date of eligibility. Funding will not be approved for any training already received by the applicant.

Area 19 staff **may approve** financial assistance for all appropriate training for eligible participants for any period after eligibility has been determined and documented.

14. Client Reporting Responsibilities.

Program participants must present grades and schedules for succeeding terms to provider's staff at the end of each grading period prior to the next term. A minimum 2.00 GPA must be maintained unless a higher GPA is required by the course of study. It is recognized that the participant must pre-register for the next season's courses before a grading period ends. Whenever it becomes evident that a participant has achieved a GPA below 2.00, his/her staff counselor **may** at that time discontinue financial assistance or place the participant on probation for the next session. Should this occur, the participant must achieve a 2.00 GPA or higher for the next session to avoid the discontinuation of his/her funding assistance.

Participants **must** submit in writing a request to drop/add courses, change majors and/or program design to provider staff. These requests will then be reviewed for appropriateness and authorization.

Failure to adhere to the participant reporting responsibilities may result in termination of funding. When participants fail to maintain the required standards and/or fail to adhere to their reporting responsibilities, provider staff must submit a written recommendation for termination to their supervisor prior to taking action.

15. Allowable ITA Costs.

ITA expenditures are costs required by the training institution to complete the training. So long as the cost is one required to be incurred to complete the training, and it is provided for by the provider, it can be written into the ITA, even if it is also recognized as a supportive service by the Area. ITA costs required to complete the training may include, but are not limited to:

- Tuition and fees;
- Books;
- Tools;
- Uniforms;
- Tests;
- Medical immunizations/tests.

ITA costs do not include any supportive services' costs related to the ITA (e.g. transportation or child care), or other costs not provided for by the educational institution/provider. Costs must be reasonable and necessary and must represent a sound investment of public funds.

An ITA will not be used for payment of late fees caused by participant error or delay. The participant will be responsible for these items, as they are responsible for other fines or penalties or any other outstanding charges. Other items an ITA will not cover include, but are not limited to, health insurance and IT and electronic equipment unless required for completion of the course. Note that these items may be allowed pursuant to the Area's Supportive Services Policies. **See the Adult and D.W. Supportive Services Policy A-04, and the CCMEP Youth Supportive Services Policy B-02.**

16. Coordination with Apprenticeships.

On a case-by-case basis, the Area/Sub-Area may allow the use of an ITA for an individual enrolled in a registered apprenticeship program when there are no other funds available that would provide funding assistance for the apprenticeship. Additional federal funding for registered apprenticeship programs is available through several federal agencies to support business investments in apprentices and to assist educators and intermediaries in strengthening the tie between training and employment through registered apprenticeship. Sub-Area providers will check the Department of Labor's Training and Employment Guidance Letter No. 13-16 for websites for several registered apprenticeship funding resources and check those resources before providing for funding for an apprenticeship.

Only registered apprenticeship programs that have been approved by the Ohio Department of Job and Family Services (ODJFS) as recognized State apprenticeship programs, will be permitted to enter into ITAs with local areas to fund the educational portion of the registered apprenticeship for eligible apprentices. ITAs may also be used to finance pre-apprenticeship training in preparation for the formal registered apprenticeship training if the pre-apprenticeship program provider has been

approved as an Ohio eligible training provider and listed on WIET per WIOAPL No. 16-02, Eligible Training Providers.

All registered apprenticeship programs approved by ODJFS are automatically approved as eligible training providers and included on Ohio's eligible training provider list contained on WIET.

17. Coordination with the TRADE ("TAA") Program.

Individuals who are eligible for assistance under TAA (Trade Adjustment Assistance) are not eligible for WIOA-funded ITAs.

If a participant is already enrolled in a WIOA-funded ITA and subsequently becomes eligible for funding through TAA, it must be determined whether to continue funding the ITA with formula dollars or to fund the remainder of the training with TAA funds based on the following criteria:

- If the WIOA-funded ITA uses the same payment point as the Trade program ITA, the local area must make arrangements for the remainder of the ITA to be funded by TAA beginning at the next payment point. Local areas must coordinate with Trade staff to develop a plan for transitioning participants from one funding stream to another without negatively affecting the employer or the participant.
- Regardless of whether participants remain in the WIOA-funded ITA or transition to TAA funding, it is required that the participant be co-enrolled in both the WIOA-funded ITA and Trade programs and that the ITA be approved under both programs (even if it is being fully funded by formula dollars) to ensure the participant may qualify for other associated Trade benefits and services.

V. Definitions.

Appropriateness: the possession of qualities which are right, needed, or suitable for training services.

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 jobs: jobs determined through state strategic priority and considered critical to the health and well-being of Ohioans. Some examples of critical jobs may include those outlined by RecoveryOhio that educate employers about hiring individuals in recovery and addressing substance use in the workplace plus children's initiatives focused on pediatric mental health.

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.

Extenuating circumstances: an economic hardship that is beyond the reasonable control of the person(s) responsible for providing financial assistance to the WIOA participant for training.

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 Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-11.1, Use of Individual Training Accounts (ITA).

In-demand occupation: 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 listed on the State In-Demand Occupations list or as defined by the local area.

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.

Long-term training: For this policy is defined as training which is completed between twelve (12) and twenty-four (24) months of time. Long-term training does not exceed 24 months.

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.

Program of training services: a structured regimen leading to recognized post-secondary credentials, industry-recognized credentials, employment, and measurable skill gains toward credentials or employment.

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.

Self-Employed individuals: For the purposes of establishing Dislocated Worker Eligibility, self-employed individuals, includes contractors and those working in the gig economy, who are unable to work due to the Covid-19 pandemic.

Short-term training: For this policy is defined as training which is completed in twelve (12) months or less. Short-term training, especially for programs that are six (6) months or less is the preferred path for training because the goal is for program participants to obtain employment quickly, and because those dislocated workers receive a maximum of twenty-six (26) weeks of unemployment.

Temporary Assistance for Needy Families (TANF): A program administered by the Ohio Department of Job and Family Assistance and the County DJFS, to provide assistance to those families (meaning typically at least one minor in the household), in need of assistance.

VI. Monitoring.

The Area will conduct oversight and monitoring of the implementation of all WIOA programming by all OMJ Center operators, partners, and/or providers pursuant to **Area Workforce Policy D-03**. Any issues discovered will be handled through the area's monitoring resolution process.

VII. Systems Reporting.

A. Fiscal Reporting.

Any and all funds used to fund ITA programming will be reported as program costs. The fiscal agent for the Sub-Area and Area must track funds used for individual training accounts by funding stream and by the year of appropriation. These fiscal agents will report ITA expenditures using the ITA adult, dislocated, and/or youth CCMEP code established by the Office of Fiscal and Monitoring Services. ODJFS will monitor costs reported against the ITA program.

B. Program Reporting.

ITA programs will be reported in OWCMS with at least the minimal amount of data required. If the Sub-Area wishes to co-enroll an ITA participant, co-enrolled participants must meet all eligibility requirements for each of the adult, dislocated worker, and/or youth programs for which they are enrolled.

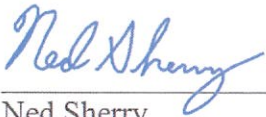
As recipients of WIOA funds, the Area Workforce, the OMJ operators, partners, and providers will be required to maintain and report accurate program and financial information. Pursuant to rule 5101:9-30-04 of the Ohio Administrative Code, information regarding WIOA participants and their activities and performance must be entered into Ohio Workforce Case Management System (OWCMS) accurately and timely. OWCMS may be used to assist in the determination of eligibility. However, OWCMS cannot be used as verification of adult or dislocated worker eligibility. **Area Workforce WIOA Policy C-09** regarding Source Documentation for WIOA Eligibility, lists the type of acceptable documentation to verify eligibility for the WIOA adult and dislocated worker programs.

VIII. Technical Assistance.

To get questions answered and technical assistance regarding this policy or issues regarding administration of WIOA, you are urged to contact the Executive Director of the NOC COG at craigsernik@neohio.twcbc.com.

The question/issue will be researched, analyzed, and a formal written response will be provided. If a second opinion is required, the director is not available, or there is no clear answer to the question/issue, either the Executive Director or any OMJ Center or provider staff may seek additional guidance by submitting the same to the Office of Workforce Development: WIOAQNA@jfs.ohio.gov; and by copying your request to the Executive Director of the NOC COG.

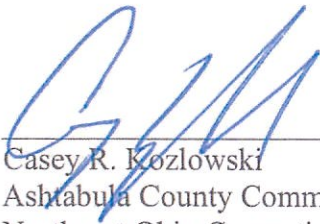
IX. Signatures.



Ned Sherry
Area WDB Chairperson

8/19/2025

Date



Casey R. Kozlowski
Ashabula County Commissioner
Northeast Ohio Consortium Council of Governments,
Chief Elected Official

Date

Original Version Approved: August 5, 2015

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 March 4, 2020
 September 2, 2020
 June 25, 2025