

Local WIA Policy in Ohio

An analysis of policies that impact training services for adults

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Executive Summary

Developing the skills of the adult workforce is essential in order to increase the prosperity of Ohio families and expedite the state's economic recovery. The term "workforce development" encompasses a continuum of funding, programs, and services for students, job-seekers, workers, and employers. Programs funded by the federal Workforce Investment Act (WIA) are considered synonymous with workforce development and are also cited as examples of what is not working with workforce development in Ohio.

Both state and local workforce boards have WIA policymaking roles and responsibilities. These policies, along with federal regulations, guide how WIA funds are spent and who is served by the WIA system. Community Research Partners (CRP) undertook research to examine the local WIA policies that most directly affect training services for low-income adults. A goal of the research is to provide information that can advance previous CRP policy recommendations calling for greater state-level WIA policy direction, increased targeting of WIA funds to populations with the greatest barriers to employment, and more consistency in policies and services across Ohio's 20 local workforce investment areas.

The WIA program

The 1998 Workforce Investment Act, administered by the U.S. Department of Labor (USDOL), is the largest source of federal funding specifically for workforce development. States are required to allocate most WIA funds to local workforce investment areas (LWIAs or "local areas") in accordance with federally prescribed procedures. WIA legislation requires that states and local areas establish business-led workforce governance and policy boards, known as Workforce Investment Boards (WIB).

WIA funds are used to provide services to youth, adults, dislocated workers, and employers. These services range from self-service job search tools (core services), to staff-assisted skill assessment and employment plans (intensive services), and training services and supportive services that allow individuals to participate in job search and training.

WIA in Ohio

In Ohio, the Ohio Department of Job and Family Services (ODJFS) is the state agency that administers the WIA program. Local WIA services are provided through 20 local WIBs, which have jurisdictions that range from a single county, to a 43-county area with 11 regional sub-areas. Ohio's local WIBs have much greater policymaking power than does the state workforce board, because of WIA's emphasis on local decision making and the state's history of devolving policymaking to cities and counties.

WIA funding

From 2001 to 2010, regular federal WIA appropriations decreased by nearly 30%, with another 10% cut in the fiscal year (FY) 2011 budget. The 2011 budget resolution also decreased the percentage that governors could retain for statewide activities from 15% to 5%. Ohio's FY 2011 WIA allocation was \$105 million, down \$22 million from FY 2010, reflecting decreased federal appropriations and increased unemployment across the nation.

Research design

The state and federal government require LWIAs to establish policies on 20 topics. This research focused on examining four local area policies that directly impact the provision of training services for low-income adults: (1) Individual Training Accounts (ITAs), (2) Limited Funds/Priority of Service, (3) Supportive Services, and (4) On-the-Job Training (OJT). For each policy, CRP identified two key policy questions and used these to compare policies across Ohio LWIAs (Table ES-1).

Table ES-1. Local WIA Policy Review Overview

POLICY TOPIC	DESCRIPTION	LOCAL POLICY REVIEW QUESTIONS
Individual Training Account (ITA/ training voucher)	The primary mechanism through which WIA training is delivered to adults. Adults use ITAs to purchase training services on their local WIB’s Eligible Training Provider list. WIA must be the payor of last resort, after other financial aid is used.	<ul style="list-style-type: none"> • What is the maximum amount of time permitted for training? • What is the maximum per client expenditure for training?
Limited Funds/ Priority of Service	Governs when and how LWIBs determine when funds are limited, at which time priority for intensive and training services must be given to individuals who are low-income or receiving public assistance.	<ul style="list-style-type: none"> • When are funds considered “limited?” • How is priority established; what groups are considered “priority” participants?
Supportive Services	Wraparound or supplemental services required by low-income adults to be successful in job search, training, or employment. Include transportation, childcare, dependent care, housing, and need-related payments (financial assistance). WIA funds may be used only if services are not available through other local programs.	<ul style="list-style-type: none"> • What services are offered? • What stipulations or restrictions apply?
On-the-Job Training (OJT)	Training provided under a contract with an employer that provides skills required for an employee to perform his or her job. Occupational training is provided for the WIA participant in exchange for reimbursement of a portion of the trainee’s wage rate to compensate for the employer’s cost of providing training.	<ul style="list-style-type: none"> • What percentage/amount of wages will be paid during training? • What are the parameters for eligible training?

The following methods were used by CRP to conduct the research: local, state, and national document and literature review; interviews with state agency staff; interviews with LWIA staff; and searches of LWIA websites and the ODJFS website.

However, CRP found that policies were not easily accessible and some local areas were reluctant to provide policy documents. ODJFS was able to provide ITA policies for 17 local areas. CRP obtained the other three policies from eight local areas, which cover 57 of Ohio’s 88 counties. However, CRP was unable to obtain policies from many areas of the state.

Local WIA policy review

CRP found both similarities and differences in the local area policies reviewed. In general, similarities in policies reflected adherence to federal regulations and “cross-pollination” with policies of other local areas. However, the research raised questions about the basis for the sometimes marked variances in local area policies across the state and about the basis for particular policy parameters. There was a great deal of variation in policy dates, with policies ranging from those adopted as recently as 2010-2011 to those that have not been updated since 2001. Table ES-2 outlines the key similarities and differences found in the policy review.

Table ES-2. Key Similarities and Variations in LWIA Policies

ITA POLICIES: SIMILARITIES	ITA POLICIES: VARIATIONS
<ul style="list-style-type: none"> • Client determined eligible if they have received core services and one intensive service, but are unable to obtain employment. • ITAs must be used after Pell Grants, scholarships, or other financial aid (except student loans). • Information is provided to an individual on Eligible Training Providers, and the ITA must be awarded for the customer’s chosen provider. • Training must be for an in-demand occupation or locally targeted industry sector to assure that they can obtain employment after training. 	<ul style="list-style-type: none"> • The maximum duration of an ITA varies from one year maximum to an indefinite length of time. • The maximum ITA amount varies from \$5,000 over five years to \$20,000 for a two-year program. • Some areas set no maximum length of time for training completion, and others have no limit on funds available to an individual. • Some areas include supportive services in ITA funding caps, and others do not. • Areas measure training duration in many different ways: by months, years, semesters, credit hours.
LIMITED FUNDS POLICIES/PRIORITY OF SERVICE POLICIES: SIMILARITIES	LIMITED FUNDS POLICIES/PRIORITY OF SERVICE POLICIES: VARIATIONS
<ul style="list-style-type: none"> • Policies had a high threshold—most were 70% or greater—for determining funds are limited. • No area policy clearly states how its limited funds figure was arrived at or why funding is not limited prior to that point. • Priority of service when funds are limited is given to persons who are low-income or receiving public assistance and veterans and their spouses. 	<ul style="list-style-type: none"> • The threshold for limited funds ranges from 60% to 90%. • Some policies set limited funds thresholds based on funds obligated, whereas others use funds expended. • Policies for establishing priority of service range from simple (low income/public assistance and veterans) to complex point systems based on target population groups and specific barriers to employment.
SUPPORTIVE SERVICES POLICIES: SIMILARITIES	SUPPORTIVE SERVICES POLICIES: VARIATIONS
<ul style="list-style-type: none"> • To receive Supportive Services an individual must be an active participant in WIA services. • Services are tailored to the needs of the customer, based on an individual assessment and employment and service plan • WIA funding will be used only if services are not available from another community organization. 	<ul style="list-style-type: none"> • Policies vary widely in their specificity. One policy does not specify what services qualify as Supportive Services; another has a detailed attachment. • Policies vary in the services permitted. One policy funds only transportation services; others identify a wide range of services that can be provided. • Some policies cap the amount of Supportive Services funding an individual can receive; others have no cap. • Only one policy reviewed identifies Needs-Related Payments (cash assistance) as an allowable service; one policy specifically excludes these payments.
OJT POLICIES: SIMILARITIES	OJT POLICIES: VARIATIONS
<ul style="list-style-type: none"> • Employers receive at least a 50% wage reimbursement for OJT participants. • OJT must be for a job paying more than a certain wage threshold and offering at least 32 hours a week of work. • OJTs are capped at six months. 	<ul style="list-style-type: none"> • Only 3 policies include the sliding scale, permitted under a state waiver, that provides a higher wage reimbursement for certain categories of employers and trainees. • The minimum wage requirement for occupations for which participants are being trained varies: \$8/hour, \$10/hour, prevailing wage. • One area sets a <i>minimum</i> training duration. • Two policies specify that employers can find an employee in advance of the employee’s WIA eligibility (“reverse referrals”).

Observations about LWIA policies

As a result of carrying out this research and analyzing the findings, CRP offers the following observations about local WIA policies in Ohio:

- A. LWIA policies are not easily accessible.** The state does not maintain a central repository of LWIA policies, and many local areas do not post policies on their websites or make them easily accessible to the public.

- B. Policy documents range from very broad to extremely technical.** Policy documents that lack specificity, as well as those that are very complex, raise questions about how understandable or useful they are to local workforce staff, businesses, and customers.
- C. There are policy similarities across LWIAs.** Federal regulations, state guidance, and “cross pollination” across local areas have produced consistency in key components of local policies, with the greatest similarity in Limited Funds/Priority of Service policies.
- D. There are important differences in the policies.** The greatest variations were found in ITA maximum training time limit and training expenditure per client policies. Differences were also found in the type and amount of Supportive Services provided, and minimum OJT wage rates.
- E. There are cross-policy complexities and inconsistencies.** The review of this subset of local WIA policies surfaced cross-policy issues, most notably between Supportive Services and ITA policies and between Supportive Services and Limited Fund policies.
- F. Written policies are the starting point.** As would be expected, WIA policy documents leave room for discretion and interpretation. Local workforce staff indicated that *how* policies are implemented is as important, if not more so, than *what* policies say.
- G. The policy review raised as many questions as it answered.** It was not possible, based on this research, to determine which policies were the best and should be recommended for replication statewide. Additional research would be needed to assess how the policies are used and their impact on client services and outcomes.

Recommendations for state WIA policy

Although the focus of this report is on local area policies, the state can play an important role in assuring effective WIA policy statewide. Based on our research findings, CRP recommends the following state actions to effectively use shrinking federal workforce funds:

- A. Develop a state workforce policy context for local WIA policymaking.**
 - Set a lower threshold for “limited funds” to allow prioritization of workers with barriers to employment.
 - Require a minimum percentage of funds to be spent on training activities and related supportive services.
 - Establish criteria for the most effective way to use training funds.
 - Link WIA training funds to industry sector strategies and career pathways.
- B. Help local areas share best practices and establish effective policies.**
 - Convene LWIA staff to share policies and best practices.
 - Provide policy templates, guidelines, and technical assistance to LWIAs.
- C. Collect and report data on WIA expenditures by activity.**
 - Collect uniform WIA data statewide that measures how policies impact local WIA policies and expenditure patterns.
- D. Reduce state-level program fragmentation.**
 - Reduce or eliminate “boutique” programs at the state level.
 - Use state discretionary funds to support the implementation of effective policies and expand local services.

1. Introduction

Since 2004, Community Research Partners (CRP), the Ohio partner in the national Working Poor Families Project (WFPF), has proposed research-based strategies to strengthen state policies and programs affecting Ohio's low-income working families. A focus of much of this work has been on improving the effectiveness of state and local programs for the education and training of the adult workforce. This is particularly important in a state where 44% of adults ages 18 to 64—3.2 million Ohioans in 2009—have no postsecondary education, a higher percentage than 36 other states (WFPF, 2011). Developing the skills of the adult workforce is essential to both increasing the prosperity of Ohio families and expediting the state's economic recovery.

Workforce development encompasses a continuum of programs and services for students, job-seekers, workers, and employers. CRP's 2010 report *Help Wanted: A lead state workforce official* identified nearly \$3 billion in state and federal funds, administered by nine state agencies, that directly or indirectly support adult workforce development in Ohio (CRP, 2010). This includes funding for adult basic education, adult career centers, two-year and four-year colleges and universities, employer incumbent worker training, local workforce boards and One-Stop centers, co-op/internships and apprenticeships, and supportive services. *Help Wanted* called for stronger state leadership across this complex and fragmented array of programs and agencies to better serve employers and workers.

A need to strengthen Ohio WIA policy

Despite the scope of workforce development activities in Ohio, one set of programs is seen as synonymous with “workforce development”—those funded by the federal Workforce Investment Act of 1998 (WIA). However, available data on key metrics paint a challenging picture of WIA in Ohio. According to program year (PY) 2008 data from the U.S. Department of Labor (USDOL), Ohio ranked 35th among all states in “entered employment” and 27th in “average earnings”—two WIA adult performance measures (USDOL, 2010a). A Center for Law and Social Policy (CLASP) review of state PY08 WIA data on low-income participation in training services found that Ohio was in the group of 11 states with the lowest percentage of low-income participation (fewer than 50% of participants). The highest 21 states had low-income participation of 75% or more (Ridley, 2010).

WIA programs are often cited as “what isn't working” with workforce development in Ohio. The state and local WIA systems are described, particularly by employers, as fragmented, complex, and bureaucratic. Many factors contribute to this assessment: (1) the variation in local policies and services resulting from strong local control and decision making; (2) regional diversity in labor supply and demand occupations; (3) a lack of clear, consistent state policy guidance and support; and (4) the constraints inherent in the rules and regulations of the federal WIA program. However, local workforce staff members indicate that they are doing their best to provide services to workers and employers in an environment of shrinking funding, increasing demand, and changing state priorities.

Despite these challenges, the local WIA system remains central to workforce development in Ohio and in the nation. The WIA funding that flows through this system represents the largest source of federal funding for workforce development, and a fundamental principle of WIA is local control and policy discretion. The change in the 2011 federal WIA allocation, which shifts 10% of the grant from statewide activities to local workforce areas, indicates that local areas will continue to have an important role in WIA policy in the future. However, despite decreases in statewide funds, states still have authority to establish statewide WIA policy. States can use this authority to provide a policy framework for local areas that targets WIA funds to training and related services for low-income adults.

Research goals and methods

A recurring theme of the recommendations in *Help Wanted* and other CRP policy reports is the need for greater state-level WIA policy direction, increased targeting of WIA funds to populations with the greatest barriers to employment, and more consistency in policies and services across Ohio's 20 local workforce investment areas (LWIA or "local area"). However, in order to advance these recommendations, CRP realized we needed a better picture of LWIA policies. We theorized that if state and local area staff could see the full range of policies across the state and understand the implications of various policy choices, it could lead to the adoption of more effective, consistent policies statewide.

Initial research design

Initially, the research was intended to review WIA Adult policies from the 20 local areas in order to determine if there are policies associated with better outcomes for low-income, low-skill adults. However, barriers were encountered to implementing this research design. First, the Ohio Department of Job and Family Services (ODJFS), the state agency that administers the WIA program, does not maintain a central repository of local area policies. To undertake the research, CRP would have to collect policies area-by-area. In addition, as we began talking to LWIA directors about the research, some expressed reluctance to provide policies, particularly if the research would link policies with performance.

As CRP reviewed policy documents and talked to local and state workforce staff, we also learned that written policy documents tell only part of the story. How the policies are implemented on a day-to-day basis has a great deal to do with how services are provided to customers, but gathering information on local implementation practices was beyond the scope of the research. Finally, because LWIAs are not required to report WIA expenditures by activity, good data are not available to link policies with performance.

Final research design and methodology

The final research design focused on key parameters of four local area WIA policies: (1) Individual Training Accounts (ITAs), (2) Limited Funds/Priority of Service, (3) Supportive Services, and (4) On-the-Job Training (OJT). These policies were selected from the 20 LWIA policies required by the State of Ohio and federal legislation because they most directly impact the provision of training services for low-income adults. CRP identified similarities and variations across the local area policies reviewed.

The research and analysis also included the following:

- An overview of the federal WIA program and WIA policy environment, including the structure of the Ohio workforce system
- A summary of key federal and state regulations, policies, and guidance that impact how Ohio local area policies are written
- Recommendations for how the state can better support and guide local areas to adopt policies that improve services for Ohio's low-skill adults

CRP used the following methods to conduct the research:

- Local, state, and national document and literature review
- Interviews with state agency staff
- Interviews with local area staff
- Searches of LWIAs' websites and the ODJFS website

CRP was able to obtain ITA policies from ODJFS for 17 local areas and Limited Funds/Priority of Service, Supportive Services, and OJT policies from 8 local areas.

2. WIA overview

The 1998 Workforce Investment Act, administered by the USDOL Employment and Training Administration, is the largest source of federal funding specifically for workforce development nationally and in Ohio. Title I of the WIA legislation was written to overhaul the nation's workforce system by requiring state and local partnerships; local administration and policy discretion; a strong role for boards and the private sector; customer empowerment and choice; increased accountability; and streamlined local access to employment, training, and supportive services (ODJFS, 2010b).¹

WIA Title I funds are allocated through three funding streams: Youth, Adult, and Dislocated Worker (Table 1). According to USDOL, the Adult and Dislocated Worker Program is designed to provide quality employment and training services to assist eligible individuals in finding and qualifying for meaningful employment and to help employers find the skilled workers they need to compete and succeed in business (USDOL, 2010d).

WIA services are provided through local One-Stop delivery systems. WIA Adult and Dislocated Worker services range from general job search assistance (core services), to comprehensive career planning (intensive services), to provision of funds for job training and supportive services (Table 1). Ohio is one of 42 states that has a waiver from USDOL to use "common measures" for WIA performance reporting. The Adult Program measures are entered employment, employment retention, and average earnings. USDOL provides specific formulas for reporting performance for each measure (USDOL, 2006).

In Ohio, ODJFS is the state agency responsible for WIA administration. Local WIA services are provided through 20 local workforce investment areas (LWIAs) and 90 One-Stop centers. Through interagency agreements, WIA funds have been used by the Ohio Department of Development for incumbent worker training grants, business services, and the Governor's Workforce Policy Advisory Board and by the Ohio Board of Regents for the Ohio Skills Bank (Turocy, 2011).

WIA funding

In 2003, federal WIA authorization expired, and reauthorization attempts by Congress have failed. However, WIA has continued to be funded under the provisions of the 1998 law. USDOL annually allocates WIA funds to states for the three program components, using complex formulas that include census data on disadvantaged youth and adult populations, unemployment rates, and other employment data. No state matching funds are required.

States are required to allocate most WIA funds to local workforce investment areas in accordance with federally prescribed procedures. Prior to fiscal year (FY) 2011, governors could retain 15% of the total WIA grant for state administration and statewide activities; however, the 2011 federal budget resolution reduces this to 5%. States can retain 25% of Dislocated Worker funds for Rapid Response services.

For FY2010 (July 1, 2010, through June 30, 2011), Ohio's total regular WIA allocation was \$127.5 million (which does not include carryover or unspent federal stimulus funds). Of this total, \$95.5 million was allocated to LWIAs by a formula established by ODJFS and approved by the Governor's Workforce Policy Advisory Board. The formula includes factors similar to those used by USDOL to determine WIA grants to states, and states have limited ability to change the formula. In FY2010, the state retained about \$32.0 million for statewide programs, Rapid Response services, and state administration (Turocy, 2011).

Since 2008, Ohio's annual WIA allocation has been dropping as a result of decreases in federal appropriations and increased unemployment across the nation. WIA Title I appropriations decreased by nearly 30% from 2001 to 2010 (National Skills Coalition,

2011a). The 2011 federal appropriation act, signed on April 15, 2011, results in a 17% cut (\$22 million) in Ohio’s 2011 WIA allocation across the three funding streams, compared to 2010 (USDOL, 2010b). In addition, each year since 2008 more states qualified for the fixed portion of the WIA formula based on high unemployment rates. States such as Ohio, which experienced the economic downturn and high unemployment sooner, now get an increasingly smaller share of that part of the allocation than they did in the past. ODJFS data indicate that between 2008 and 2010, Ohio’s percentage share of the national “substantial unemployment factor” in the Adult and Youth funding formulas dropped by 37%. This factor also impacts the allocation of Ohio’s funds to local areas. More Ohio counties now meet the substantial unemployment threshold and can claim a portion of that part of the formula, so counties with historically high unemployment lose funding to those with more recent rate increases (Madson, 2010; ODJFS, 2010a).²

Table 1. Key WIA Program Terms and Definitions

	DEFINITION
Customer Groups	Youth: A low-income or at-risk individual age 14 to 21 who faces one of six specific barriers to employment. Young adults ages 18 to 21 who are out of school can be served under the Youth or Adult programs at the discretion of the local workforce board.
	Adult: An individual who is age 18 or older, including employed individuals who need services to obtain or retain employment that allows for self-sufficiency; <i>procedures for applying the self-sufficiency requirements are established by states and local areas.</i>
	Dislocated Worker: An individual who, through no fault of his or her own, has been terminated or laid off or who has received notice of termination or layoff from an employer; is self-employed but unemployed as a result of economic conditions in their community or because of a natural disaster; or is a displaced homemaker who has been dependent on the income of a family member.
	Employer: An employer seeking to hire or train workers.
Types of Services³	Core Services: Services are primarily self-service, with minimal to moderate staff assistance. Includes initial skill assessment; outreach, job search, and placement assistance; and labor market information; <i>available to all job seekers.</i>
	Intensive Services: Customers receive significant staff assistance. Includes more comprehensive assessments, development of individual employment plans, and counseling and career plans; <i>priority for these services must be given to recipients of public assistance and other low-income individuals when funds are limited.</i>
	Training Services: Includes occupational training and basic skills training linked to local job opportunities. Participants use an Individual Training Account to select an appropriate training program from an Eligible Training Provider list; <i>priority for these services must be given to public assistance recipients and other low-income individuals when funds are limited.</i>
	Supportive Services: Includes transportation, childcare, dependent care, housing, and needs-related payments; <i>provided under certain circumstances to allow an individual to participate in the program.</i>
	Rapid Response Services: Provided at the employment site for employers and workers who are expected to lose their jobs as a result of company closings and mass layoffs.
	Employer Services: Assistance to businesses to find good employees, fund training on and off the job to improve the quality of their workforce, administer tax credits available when they hire certain workers, and access labor market information.

Source. ODJFS (2010b).

3. The WIA policy environment

WIA policy in Ohio is shaped by factors that include (1) the requirements of federal WIA legislation, (2) Ohio’s strong home rule tradition, and (3) the diverse geographic and governance structures of Ohio’s local workforce areas.

The role of Workforce Investment Boards

WIA legislation requires the establishment of state and local business-led workforce governance and policy boards (WIBs) in order to address the specific service needs of local labor markets. State and local boards have different roles and responsibilities (Table 2). In some states, legislation to authorize WIA administration created additional roles and responsibilities for the state workforce policy board (Workforce Development Council, 2010). Ohio’s WIA enabling legislation, however, simply references federal requirements for state boards (Bennett, 1999).

In Ohio, local WIBs have much more policymaking power than does the state WIB, because of both WIA’s emphasis on local control and decision making and Ohio’s history of devolving policymaking to cities and counties. In fact, H.B. 470 requires the Director of ODJFS to establish a workforce development system that provides the maximum flexibility and authority to counties and municipal corporations (Bennett, 1999).

Table 2. Federal Requirements for State and Local Workforce Investment Boards

	ROLES AND RESPONSIBILITIES
State Workforce Investment Board	<p>The Governor’s Workforce Policy Advisory Board (state WIB), appointed by the governor through an Executive Order, must include representatives of business, labor, service delivery organizations, city and county elected officials, and state agencies. The chair and at least 51% of the members must be business representatives. The state WIB advises the governor on issues related to the state workforce system and has the following responsibilities:</p> <ul style="list-style-type: none"> • Developing the state plan • Establishing state WIA implementation policies, interpretations, guidelines, and definitions • Developing and continuously improving a statewide system of activities • Designating local workforce areas • Developing allocation formulas for the distribution of funds to local areas • Developing and improving comprehensive state performance measures • Reviewing local plans • Developing a statewide employment statistics system • Preparing an annual report to USDOL
Local Workforce Investment Board	<p>Each local workforce area must be governed by a local workforce board (LWIB), with members appointed by local elected officials. The LWIB must be chaired by a business representative and have business representatives as a majority of its membership. The LWIB must include representatives from labor, local educational agencies, community-based organizations, economic development agencies, and other One-Stop partners. Responsibilities include these:</p> <ul style="list-style-type: none"> • Developing a local plan • Establishing local WIA implementation policies, interpretations, guidelines, and definitions • Selecting and entering into memoranda of understanding with entities designated as One-Stop operators • Identifying eligible providers of training services • Developing a budget and administering grants under the program • Overseeing the local system • Negotiating local performance measures with the state • Coordinating workforce investment activities with economic development strategies • Establishing a youth council to plan and oversee youth programs and services

Sources. National Skills Coalition (2011a), WIA (1998 & Supp. 206, §661).

The structure of the Ohio workforce system

The geographic configurations and governance structures of local areas have an impact on how WIA policies are established and workforce services are delivered across Ohio. They also pose challenges to establishing consistent, statewide WIA policy.

Local area designation and certification

The geography of Ohio's local WIA areas lacks alignment with other programmatic regions, service areas, and regional economies. This is frequently cited as a barrier to an effective Ohio workforce system. The local areas that now exist emerged over time, beginning with the process that all states undertook when the WIA program was established in 1999.

WIA gives governors the power to approve requests by local units of government for designation as a local workforce investment area, after consultation with the state workforce board and chief local elected officials. The act includes five criteria that a governor must consider when determining local area designation:

1. Geographic areas served by local and intermediate educational agencies
2. Geographic areas served by postsecondary institutions and area vocational schools
3. The extent to which such local areas are consistent with labor market areas
4. Distance that individuals will need to travel to receive services in such local areas
5. The resources of such local areas that are available to effectively administer the activities carried out as part of the local workforce investment system

The legislation includes three types of designations:

- Automatic designation—A single unit of government with a population of 500,000 or more received an automatic five-year local area designation upon request.
- Temporary and subsequent designation—A unit, or combination of units, of local government with a population of 200,000 or more that was a Service Delivery Area under the Job Training Partnership Act (JTPA) and met JTPA performance and fiscal standards received a temporary designation for two years, with redesignation based on performance.
- Recommendation of state board—Any county/city that wanted to stand on its own as a local area, or any consortium of jurisdictions that wished to work together as a local area, could ask the state board to recommend local area designation (WIA, 1998 & Supp. 2006, §2831).

Every two years, governors are required to certify a workforce board for each local area, based on legislative requirements and other membership criteria established by the state board. WIA legislation cites failure of a local area to substantially meet (as defined by the state board) local performance measures or to sustain fiscal integrity as reasons that a governor can deny or modify designation of a local area.

The Ohio Option Area

When Ohio established its WIA program in 1999, it added another workforce area designation type—called the Ohio Workforce Option Area—under the “recommendation of state board” category. All local jurisdictions (initially 82 counties and two cities) that requested this option made up a single, multicounty workforce investment area under one local workforce board (WIA Area 7). Within this large area, there were initially WIA programs operated by individual counties and programs operated by multi-county regional collaborations, for a total of 45 sub-areas within Area 7. Ohio's 2000 WIA Annual Report describes the Ohio Option Area as follows:

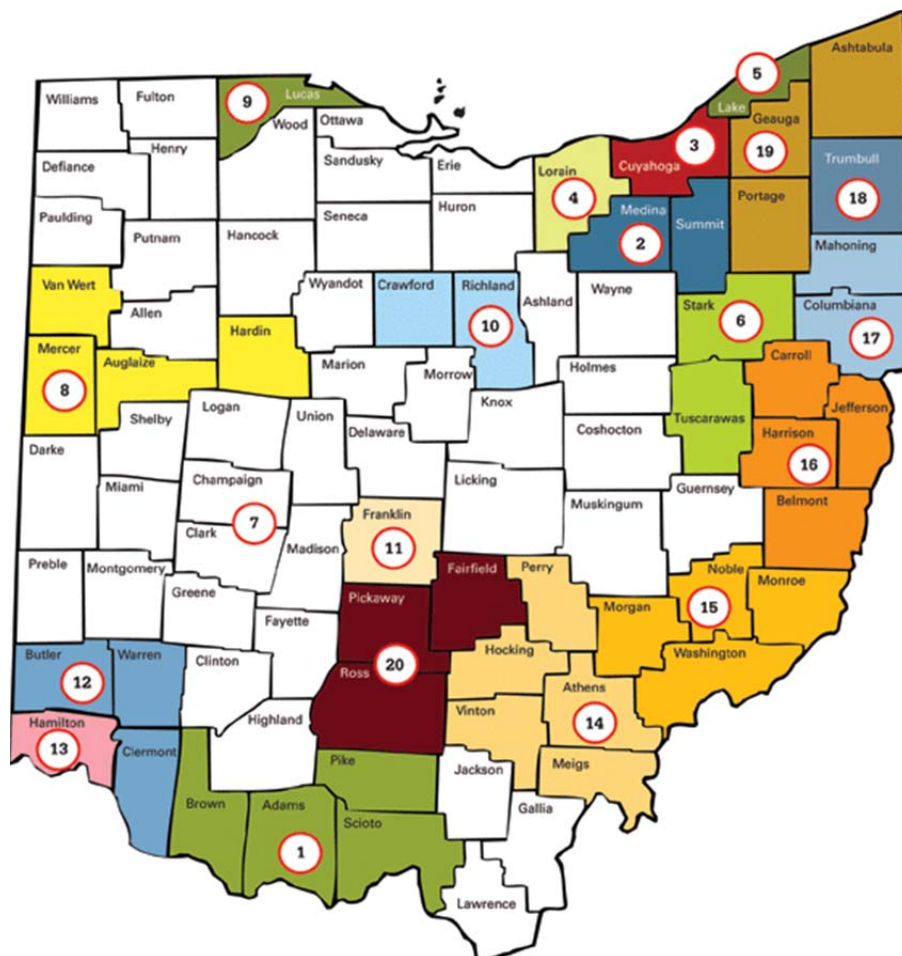
The Ohio Option Area...was developed...to provide greater flexibility and local control over workforce dollars; a single point of accountability at the local level; a significant opportunity to more effectively leverage workforce development dollars; and to have smaller more manageable and employer-driven local workforce policy boards. (ODJFS, 2001)

In addition to giving counties a great deal of control over WIA resources and policymaking, a goal of the Ohio Option was to align the geography of WIA administration with that of the Temporary Assistance for Needy Families (TANF) program, which is administered by counties. During this time, similar alignment was taking place at the state level. H.B. 470, the WIA authorizing legislation, also created ODJFS to bring state workforce and welfare programs into one agency. Although the effort to align WIA and TANF through the Ohio Option was recognized nationally as being innovative, it subsequently caused the state to have many WIA compliance issues (Patel, Ranghelli, & Greenberg, 2003).

Current local area geographies

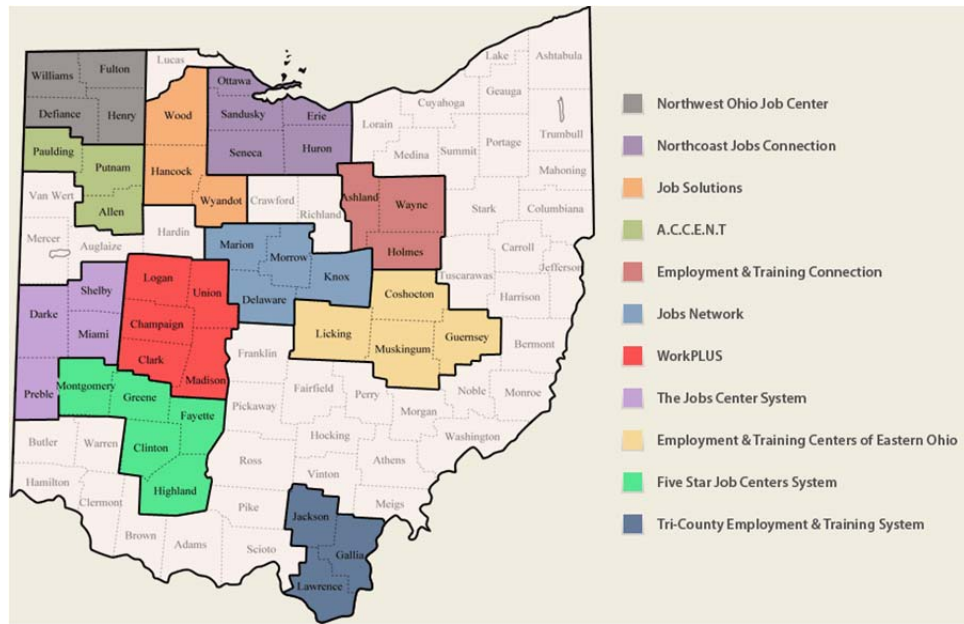
In 2000, Ohio had a total of seven local workforce areas. Since 2000, Area 7 has become smaller as counties and cities entered into agreements to form multijurisdictional workforce areas. Other counties removed themselves from Area 7 to form single-county workforce areas. There are now 20 local WIA areas in Ohio (Figure 1), including Area 7, which has 43 counties within 11 regional sub-areas (Figure 2).

Figure 1. Ohio Local Workforce Investment Areas, 2011



Source. ODJFS (2011b).

Figure 2. Ohio Area 7 Regional Sub-Areas, 2011



Source. Area 7 Workforce Investment Board (2011).

Local area governance structures

Ohio LWIBs operate under four governance models (Table 3). In multicounty regions a variety of arrangements determines which entity is the fiscal agent, which is the administrative agent, and how board members are selected. County government is the fiscal agent for 15 of 20 local areas. Although no data exist to help determine whether any governance or administrative structure has advantages over others, greater consistency may facilitate standardization of policies and services across the state.

Table 3. Ohio Local Area Governance Structures

AREA	GOVERNANCE TYPE	FISCAL AGENT (GRANT RECIPIENT OF WIA FUNDS)
1	IGA	Community Action Organization of Scioto County, Inc.
2	IGA	Summit County Department of Job and Family Services
3	Single-county government	Cuyahoga County Department of Workforce Development
4	Single-county government	Lorain County Department of Job and Family Services
5	Single-county government	Lake County Department of Job and Family Services
6	COG	Workforce Initiative Association
7	IGA	Montgomery County Department of Job and Family Services
8	IGA	Mercer County Commissioners
9	Single-county government	Lucas County Workforce Development Agency
10	COG	Richland County Department of Job and Family Services
11	501(c)(3)	Central Ohio Workforce Investment Corporation
12	Single-county government	Butler County Department of Job and Family Services
13	Single-county government	Hamilton County Department of Job and Family Services
14	Single-county government	Vinton County Department of Job and Family Services
15	COG	Ohio Valley Employment Resource
16	COG	Belmont County Department of Job and Family Services
17	COG	Mahoning & Columbiana Training Association
18	Single-county government	Trumbull County Department of Job and Family Services
19	501(c)(3)	Geauga Ashtabula Portage Partnership, Inc. Administrative Offices
20	IGA	Ross County Department of Job and Family Services

COG—council of governments; IGA—intergovernmental agreement; 501(c)(3)—independent, nonprofit organization.

Source. ODJFS (2011).

4. Local area WIA policies

As the WIA policy environment overview in the previous section highlights, the policies that most directly impact how workforce services are delivered are made by local workforce boards. CRP has frequently recommended that the state assume a stronger policymaking role to achieve greater consistency in WIA policies across Ohio (CRP, 2004, 2009, 2010); however, local workforce areas must be active partners in making this happen. The inventory of selected local area policies in this section is intended to be a first step in identifying policies that could be replicated or standardized to achieve desired outcomes for workers and businesses.

Required WIA policies

WIA regulations (20 C.F.R. 661.120) require state and local workforce boards to “establish local policies, interpretations and guidelines that are not inconsistent with WIA or [federal] regulations.” The State of Ohio and federal legislation require specific policies, and local areas in Ohio must assure that they have each of them (Table 4).

Table 4. Federal and State Required LWIA Policies

POLICY TOPIC	STATUTE OR POLICY
Determination of Limited Funds	WIA, Section 134(d)(4)(E)
Priority of Services for Limited Funds	Regulations, Section 663.600(a)(b)
Self-Sufficiency	WIA, Sect. 134(d)(3)(A)(ii) Regulations, Section 663.230
Supportive Services	Regulations, Section 663.800
Monitoring	WIA, Section 117
Individual Training Account (ITA)	Regulations, Section 633.420(a)
Definition of “face serious barriers to employment”	WIA, Section 129 (c)(5)
Definition of sixth barrier criterion	Regulations, Section 664.210
Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders in the Workforce Investment Act Program	State Policy WIAPL 08-13.1
Suitability Policy	State Policy WIAPL 08-12.2
Local WIA Programs under American Recovery and Reinvestment Act	State Policy WIAPL 08-17 (10/2/09)
Customized Training	State Policy WIAPL 09-07 (1/11/10)
Determination of Dependent Status	State Policy WIAPL 08-11.1 (8/10/09)
Selective Service Registration	State Policy WIATL No. 13
Rapid Response Funded Needs-Related Pay	State Policy WIAPL 09-08 (1/26/10)
Incumbent Worker Training with Local Formula Funds	State Policy WIAPL 09-09 (3/23/10)
Ohio’s Career Advancement Accounts	State Policy WIAPL 09-04 (8/31/09)
Project Hire	State Policy WIAPL 08-18 (10/8/09)
Needs-Related Payments WIA Adult/Dislocated Worker Formula Funds	State Policy WIAPL 08-14 (8/10/09)
Customized Training	State Policy WIATL No. 40 (8/11/08)

Source. ODJFS, K. Maybriar, (personal communication, August 5, 2010)

Research methods and challenges

As CRP began data collection for the project, two challenges arose that necessitated changes in the research methodology: (1) the difficulty in obtaining policy documents and (2) the inability to link policies with performance.

Despite requiring that local areas have the policies identified in Table 4, ODJFS does not maintain copies of all LWIA policies (K. Maybriar, personal communication, August 5, 2010). Department staff does monitor local areas on a regular basis, assure that policies are on record locally, and review them for compliance with state and federal requirements. However, with no central inventory of LWIA policies, it is difficult for state staff to assess how WIA is being implemented across the state. Further, without an inventory of policies, the state does not have a clear picture of the frequency with which LWIAs update their policies or when a policy was last updated. As a result, CRP determined that, to conduct this research, it would be necessary to obtain policy documents from each of the 20 local areas.

Initially, CRP planned to identify higher performing local areas and determine whether specific policies could be tied to better performance outcomes. However, it was not possible to connect local policy to local performance. A primary factor was the atypical employment and WIA funding environments over the previous 24 months,⁴ which dramatically impacted activities of local areas. This made identifying high performing local areas more difficult than simply reviewing the PY2008 WIA Annual Report submitted to USDOL.

As we began the research, several other factors emerged:

- Discussions of linking policy to performance quickly shifted the tone of discussions about the research with some LWIA representatives from openness to defensiveness.
- Many policies, or aspects of policies, were not unique to one area—there is information-sharing and cross-pollination of policies across areas.
- Initial interviewees indicated that performance is less about what is written in a policy document and more about how a policy is interpreted and implemented in the local area.

Finally, correlating policies with performance would have required a review of specific policies across *all* LWIAs, and CRP was unable to obtain policies from all—or even most—areas, despite two presentations at the Ohio WIB Directors’ Association, individual requests for policies, and online research.

Final research focus

Because of the challenges described above, CRP narrowed the research to collecting the following policies governing the use of WIA Adult funds: (1) Individual Training Accounts, (2) Limited Funds/Priority of Service, (3) Supportive Services, and (4) On-the-Job Training. These policies are among those that have been identified by the Working Poor Families Project as important to assuring that WIA services are benefiting low-income, low-skill adults. For each policy, CRP identified two characteristics that impact access to services for these adults, and these were used to compare policies across LWIAs (Table 5).

Table 5. Local WIA Policy Review Overview

POLICY TOPIC	LOCAL POLICY REVIEW QUESTIONS	
Individual Training Account	What is the maximum amount of time permitted for training?	What is the maximum per client expenditure for training?
Limited Funds/ Priority of Service	When are funds considered “limited?”	How is priority established; what groups are considered “priority” participants?
Supportive Services	What services are offered?	What stipulations or restrictions apply?
On-the-Job Training	What percentage/amount of wages will be paid during training?	What are the parameters for eligible training?

The following methods were used to conduct the research: (1) local, state, and national document and literature review; (2) interviews with state agency staff; (3) interviews with local area staff; and (4) searches of local area websites and the ODJFS website. During the course of the research, CRP also had many meetings, telephone conversations, and email exchanges with state and local workforce staff to obtain and clarify information. In addition, we made two presentations to the WIB Directors' Association to discuss the project and request local area policies.

Policies received

ODJFS was able to provide ITA policies for 17 local areas, although staff could not assure that these were current. CRP obtained the other three policies from eight local areas, which cover 57 of Ohio's 88 counties (Table 6). These areas are representative of Ohio's diverse local areas. They include single-county urban areas, midsize cities, rural counties, and suburban areas.

Table 6. Requested LWIA Policies Received, August 2010-March 2011

AREA	INDIVIDUAL TRAINING ACCOUNTS	LIMITED FUNDS/PRIORITY OF SERVICE	SUPPORTIVE SERVICES	ON-THE-JOB TRAINING
1	X			
2	*			
3	X	X	X	X
4	X			
5	X			
6	*	X	X	X
7	X	X	X	X
8	X	X	X	X
9	X	X	X	X
10	X			
11	X	X	X	X
12	X	X	X	X
13	X			
14	X			
15	X			
16	X			
17	X	X	X	X
18	X			
19	*			
20	X			

*ITA information submitted in a form other than a policy document (e.g. email or customer guidelines).

As detailed in the next sections, for many of these policies, key parameters varied across local areas. This indicates that the level and type of services a WIA customer receives could vary significantly based on where the customer accesses services.

It is also important to note that this assessment does not include all local area policymaking in Ohio. Some LWIAs further devolve policymaking. A prime example is Area 7, which has 11, two- to four-county sub-areas (see Figure 2). Each sub-area has its own name, and some have a shared website and/or marketing materials. Area 7 permits sub-areas to modify some aspects of policies to meet the needs of their area. For example, Area 7 sets a cap for formula-funded On-the-Job Training at \$8,000, but the policy states that "sub-grantees may choose to use a lower cap" (Area 7 WIB, 2010, p. 3). In Area 8, local One-Stop operators establish the procedures and limits for providing Supportive Services (Area 8 WIB, 2002).

Individual Training Accounts

Definition and federal regulations

An ITA, or training voucher, is the primary mechanism through which WIA training is delivered to adults. Adults needing training services receive ITAs, which they can use to purchase services from institutions on their local WIB's Eligible Training Provider list. Dollar and duration levels are generally set at the local level, although states may establish statewide limits (National Skills Coalition, 2011a).

Federal regulations require WIA to be the payor of last resort for training. As a result, ITAs supplement financial aid already available through other resources (when there are no other resources, an ITA may pay for all costs of training). ITAs are intended to empower customers to take an active role in the training process by enabling them to choose among available providers (WIA, 2000).

Table 7. Local Area Individual Training Accounts Policies

AREA	POLICY DATE ^(a)	MAXIMUM TRAINING TIME LIMIT	MAXIMUM TRAINING EXPENDITURE PER CLIENT
1	August, 2002	Less than 2 years	\$15,000
2 ^(b)	NA	Less than 2 years	\$8,000 year 1; \$6,000 year 2
3	July, 2007	104 weeks	\$10,000 total
4	May, 2009	3 years	\$10,000 for 1-year program; \$20,000 for 2-year program
5	July, 2009	104 weeks	\$9,000
6 ^(b)	In development	Less than 1 year or less than 32 credit hours	
7	March 2010	Less than 2 years	\$15,000, excluding supportive services
8	August 2007	Less than 30 months	\$5,000 per year; \$10,000 total
9	September 2006	3 years	\$6,000 per year; \$18,000 lifetime
10	September 2006	3 years	\$6,000 per year (includes supportive services)
11	NA	3 years (or longer for apprenticeships)	\$15,000 (\$2,000 in supportive services)
12	March 2010	24 months	\$15,000 (does not include supportive services)
13	May 2010	None stated	\$5,000 within a 5-year period (does not include supportive services)
14	October 2008	None stated	\$10,000 per year (includes supportive services)
15	Draft July 2006	8 quarters or 6 trimesters	\$4,500 for the first 4 quarters or 3 trimesters of training and \$4,500 for the second 4 quarters or 3 trimesters of training, not to exceed \$9,000
16	August 2009		\$5,000 per year
17	September 2009	24 months	\$6,500 per 12-month period, up to for 2, 12-month periods
18	May 2009	24 months	\$10,000 per ITA for tuition, fees, books
19 ^(c)	NA	NA	NA
20	November 2008	3 years	\$6,000 per year

Notes:

^(a) ODJFS staff could not assure CRP that the ITA policies provided were the most recent. Some local areas provided updated policies to CRP.

^(b) A policy document was not available for review, but information was provided by email.

^(c) The policy provided by ODJFS was for youth, therefore, not relevant to this research.

State of Ohio policy

There are six active state administrative documents related to ITAs on the ODJFS, Office of Workforce Development, State Policy and Guidance Information web page (ODJFS, 2011a). Five guidance memos, issued between 2000 and 2007, relate to certification of various types of Eligible Training Providers (proprietary schools, apprenticeship programs, community-based organizations, joint vocational schools, two- and four-year colleges and universities). The most recent, a November 2007 memo, describes the “automatic inclusion of two and four year colleges as well as career technology centers that are eligible to receive Title IV funds under the Higher Education Act” (Weber, 2007, p. 1). The memo also advises that the ultimate considerations in selecting a training provider should be the following:

1. Does the training lead to employment?
2. Are the skills and competencies achieved recognized by the employer or industry?

In addition, a 2009 policy clarifies reporting requirements for ITA obligated funds and a 2010 National Emergency Grant (NEG) ITA policy specific to Wilmington Airpark Dislocated Workers.

Analysis of local area policies

The following similarities across Ohio local area ITA policies are reflective of federal WIA regulations and state guidance:

- Individuals are typically determined eligible for an ITA by LWIA staff because they have received core services and at least one intensive service but are still unable to obtain employment.
- Policies require ITAs to be used after Pell Grants, scholarships, or other financial aid (except student loans).
- Areas provide information on Eligible Training Providers, and the ITA must be awarded for the customer’s chosen provider.
- Most LWIAs require that customers select training for in-demand occupations or locally targeted industry sectors to assure that they can secure employment once training is complete.

However, there are also key differences in ITA policies across the 20 local areas (Table 7):

- Policies have been updated as recently as May 2010 or not since August 2002.
- Policies range in depth and content from one page to more than eight pages.
- ITA duration can range from a *maximum* of one year to an indefinite length of time.
- The maximum amount of training funds per individual varies from \$5,000 over five years to \$20,000 for a two-year program.
- Some local areas set no maximum length of time for training completion, and some areas place no maximum on the length of training available to an individual.
- Some areas include supportive services in their ITA funding caps, and others do not.
- There is little consistency in how the length of training is measured—areas use months, years, semesters, trimesters, and credit hours.

To further complicate implementation, policies may vary by funding stream (American Recovery and Reinvestment Act [ARRA], regular formula, NEG) or population served (dislocated worker/youth). Several LWIAs have multiple ITA policies, each governing a component of ITAs. These nuances challenge clarity and consistency even within a single area, let alone across the state.

Policy questions raised

The review of ITA policies raises the following questions, which can guide the development of effective and consistent statewide policy:

1. *What is the basis for the policies that dictate training duration and ITA amount?*
2. *How do these policy parameters relate to the time and cost required to obtain a credential with value in the workplace?*
3. *Were the policies developed in collaboration with local education and training institutions?*
4. *Why do some ITA policies include Supportive Services, whereas others do not?*
5. *What are the education and employment outcomes for WIA customers who received ITAs? Are some local area ITA policies leading to better outcomes?*

Limited Funds/Priority of Service

Definition and federal regulations

The Limited Funds/Priority of Service policy governs when and how LWIAs determine that WIA funds are limited, at which time priority for providing intensive and training services must be given to individuals who are low-income or receiving public assistance. LWIAs must establish a priority of service policy for Adult formula funds. Having a policy for Dislocated Worker funds is optional.

Federal WIA regulations discuss Limited Funds/Priority of Service for targeted populations (WIA, 2000, §663.595) and specifically “provide [that] States and Local Boards...determine the criteria to be applied when making the determination that there are sufficient funds.” The regulations also state that “unless the Local Board determines that funds are not limited in the local area, the priority requirement will be in effect.” Further, the act stipulates that “States and Local Boards must work together to establish the criteria that must be used in making this determination.” (WIA, 2000).

Another federal law, the Jobs for Veterans Act (P.L. 107-288), establishes a priority of service for veterans and eligible spouses in all USDOL employment and training programs, including the WIA Adult and Dislocated Worker programs. A veteran must qualify as eligible under the WIA program before being eligible for priority of service, and a veteran who is low-income or a recipient of public assistance would have priority over one who is not (Kvamme & Colbert, 2011; DeRocco, 2003).

Table 8. Local Area Priority of Service/Limited Funds Policies

AREA	POLICY DATE	WHEN POLICY APPLIES	HOW PRIORITY IS ESTABLISHED
3	June 2005	70% obligated	Points system using Adult and Dislocated Worker Prioritization Worksheet; exception made if Adult/Dislocated Worker has guarantee of job after training.
6	July 2001	90% obligated or expended	When funds are limited, only participants who are low-income or on public assistance may be enrolled in intensive or training services, with preference given to veterans.
7	June 2007	70% expended and accrued—doesn't specify obligated	First priority: veterans, public assistance/low-income. Second priority: persons with most of these barriers to employment: lack high school diploma/GED, basic skills deficiency, disability, homeless, single head of household, offender, no significant work history, limited English, minority.
8	April 2009	70% expended or obligated	Public assistance/low-income top priority; out-of-area residents can receive only core services.
9	June 2009	75% obligated	Low-income/public assistance and veterans.
11	Not noted	60% expended within first 6 months or 75% at any point thereafter	Veterans; low-income/public assistance; out-of-area residents can only receive core services.
12	May 2009	75% obligated by Jan. 1 or 90% by May 1	First priority: low-income and/or receiving public assistance. Second priority: low-income or receiving public assistance without high school degree and/or single female head of household.
17	March 2008	80% obligated	Low-income/public assistance residents of the area based on point system, with one point each for lack of medical/health care coverage, lack of high school diploma/GED, lack of basic skills, single parent, homeless, offender.

State of Ohio policy

Only one active state guidance document—released in 2000—addresses Limited Funds and Priority of Service (ODJFS, 2011a). WIA Guidance Letter 2-2000 delegates “responsibility for establishing a priority of service policy for adult services to the local level” (Scholes, 2000). The state guidance acknowledges that WIA funds are “generally limited” and requires that local areas establish criteria “to determine the availability of funds and the process by which any priority will be applied” (Scholes, 2000). WIA Policy Letter No. 10-07 covers priority of service for veterans and eligible spouses and primarily reiterates USDOL guidance (Kvamme & Colbert, 2011).

Analysis of local area policies

There were a number of similarities across the local area limited funds/priority of services policies reviewed (Table 8):

- All policies had a high threshold—most were 70% or greater—for determining that funds are limited and priority of services are in effect.
- No area policy clearly states how its limited funds figure was arrived at or why funding is not limited prior to that point. None reflect the federal and state guidance that funds should generally be considered limited unless there is a clear explanation as to why funding is not limited.
- Policies reflect the federal requirement that priority of service when funds are limited be given to persons who are low-income or receiving public assistance and veterans and their spouses.

There are also some variations across policies (Table 8):

- The threshold for limited funds ranges from 60% to 90%.
- Some policies set limited funds thresholds based on funds obligated, whereas others use funds expended.
- Policies for establishing priority of service range from simple (low income/public assistance and veterans) to complex point systems based on target population groups and specific barriers to employment.

Policy questions raised

The review of Limited Funds/Priority of Service policies raises the following questions, which can guide the development of effective and consistent statewide policy:

1. *What is the basis for the Limited Funds thresholds in these policies? Why is the figure different across LWIAs?*
2. *To what extent was policy development consistent with the federal WIA requirement that states and local boards work together to establish Limited Funds criteria?*
3. *How do the thresholds relate to the state guidance stating that funds are generally limited?*
4. *What is the impact on low-income participation in Ohio WIA intensive and training services when priority of services policies are not in effect until most WIA funds are already obligated or expended?*

Supportive Services

Definition and federal regulations

Many low-income adults depend upon a variety of wraparound, supplemental, or extra services to be successful in their job search, in training, or while employed. Within WIA, these types of supports are called Supportive Services, and they must have a direct connection to an individual's ability to obtain or retain employment.

According to federal regulations (WIA, 2000), Supportive Services include "transportation, childcare, dependent care, housing and needs-related payments that are necessary to enable an individual to participate in [WIA] activities." Needs-Related Payment (NRP) is financial assistance that enables individuals who meet financial need criteria to participate in training. Supportive Services may only be paid for with WIA funds if they are not available through other local programs, and LWIAs are strongly encouraged to link to other programs to ensure that participants have access to a wide range of supports within their community.

Table 9. Local Area Supportive Services Policies

AREA	POLICY DATE	SUPPORTIVE SERVICES PROVIDED	STIPULATIONS/RESTRICTIONS
3		Transportation vouchers only in PY2010	Core: 10 all-day public transportation passes. Intensive: All day public transportation passes for participation in services. Training: public transportation for the duration of training.
6	July 2006	Transportation, services not available from other providers in the community, and needs-based payments	Core: May receive bus passes. Intensive and training: May receive supports not available from other providers. Training Participants enrolled in ITA of 3+ months—may receive payment on "needs-based" formula using bi-weekly timesheets; amount based upon distance between home and training location.
7	June 2008	Books/class materials; child/dependent care; counseling, mentoring, tutoring; grooming assistance; linkages to community services; needs-related payments; payment for vocationally necessary exams, certificates, GED; transportation; work-related expenses	Must be enrolled in WIA programming; provision of supportive services is contingent upon available funding; sub-grantees (sub-areas/counties) may establish further limits.
8	November 2002	None noted	Only for WIA participants under 200% of poverty based upon family size.
9	September 2007	Child or dependent care; transportation; work- and training-related expenses (clothing, tools); vocationally necessary exams, certificates, GED	Active WIA participant for duration of services or 36 months (whichever comes first); no needs-related or short-term emergency payments; maximum \$1,000.
11		Transportation, childcare, dependent care, emergency housing, work clothes or uniforms, licensing/testing fees, medical/health care	Active WIA participant in core, intensive, or training; provide documentation of denial from other service referrals; maximum \$2,000 per program year.
12	May 2009	Travel stipend (not to exceed \$15 a day), childcare, car repair/insurance, housing assistance, clothing, tools	Available to participants in core, intensive, or training services; unable to obtain services through other programs; necessary to participate in Title I activities.
17	July 2007	Vehicle repair, uniforms/tools, childcare, glasses, immunization/ physical exam, drug screening, transportation, fingerprint/criminal background check, driver's education classes, CPR/first aid class, professional work attire, licensing/certification exams, school supplies, professional dues	Participant in core, intensive, or training Services determined through individual plan; unable to obtain services through other programs; financial analysis to determine if client can pay for all or part of services.

State of Ohio policy

Federal guidance requires that local areas must establish policies for the provision of Supportive Services but does not stipulate that states have a role. The state has three active policies on the WIA policy website that address Supportive Services (ODJFS, 2011a). An August 2009 policy provides guidance on using Adult and Dislocated Worker formula funds for NRPs. Two policies, issued in February 2009 and January 2010, provide guidance on the use of National Emergency Grants for NRPs and for Supportive Services for Wilmington Airpark Dislocated Workers.

Analysis of local area policies

There are a number of similarities across the local area Supportive Services policies, consistent with WIA regulations:

- To receive Supportive Services, an individual must be an active participant in WIA services.
- Services are tailored to the needs of the customer, based on an individual assessment and employment and service plan.
- WIA funding will be used for Supportive Services only if services are not available from another community organization.

However, there is also variation in the local Supportive Services policies (Table 9):

- Policies have been updated as recently as 2010 or not since 2002.
- Policies vary in their specificity. One policy reviewed does not specify which services qualify as Supportive Services, whereas another includes a two-page attachment—Supportive Service Parameters—that guides local staff.
- Policies vary in the range of permitted services. One LWIA funds only transportation services, whereas others identify a wide range of services that can be provided.
- Some LWIA policies put a cap on the amount of Supportive Services funding an individual can receive, whereas others have no cap in their policy.
- Of the policies reviewed, only one area identifies NRPs as an allowable service, and one policy specifically excludes NRPs.

Policy questions raised

The review of Supportive Services policies raises the following questions, which can guide the development of effective and consistent statewide policy:

1. *How were the permitted services selected?*
2. *Why do some areas have dollar limits on services, whereas others do not?*
3. *Why do some areas provide cash assistance (NRP, emergency housing assistance), and others do not?*
4. *To what extent are the Supportive Services and ITA supportive services policies consistent?*
5. *How does the availability of Supportive Services impact the success of WIA adult customers in training and employment?*

On-the-Job Training

Definition and federal regulations

OJT is a WIA training service that may be provided on a limited basis when an ITA is not suitable or appropriate for a customer. OJT provides limited-duration training, to a paid WIA participant who is engaged in productive work, that provides knowledge and skills essential to adequate performance of his or her job.

According to federal regulations, OJT is training provided under a contract with an employer in the public, private nonprofit, or private sector. Through the OJT contract, occupational training is provided for the WIA participant in exchange for reimbursement of up to 50% of the wage rate to compensate for the employer's extraordinary costs of providing the training and additional supervision related to training (WIA, 2000). Ohio is one of 27 states with a USDOL waiver to permit a sliding scale reimbursement for small- and medium-sized businesses (USDOL, 2010c).

Table 10. Local Area On-the-Job Training Policies

AREA	POLICY DATE	EMPLOYER WAGE REIMBURSEMENT	ELIGIBLE OCCUPATIONS/RESTRICTIONS
3	October 2010	50% of wage rate up to \$10,000; up to 75%, 51–250 employees; up to 90%, 50 or fewer employees	Demand occupations paying more than \$10/hour and offering more than 32 hours/week employment, with duration of training not to exceed 6 months.
6	January 2011	50%; up to 75%, 51–250 employees; up to 90%, 50 or fewer employees	Occupation paying more than \$10/hour, but board may cap maximum per OJT episode; duration of training appropriate to occupation, not to exceed 3-6 months.
7	Draft	50% of wage rate, up to \$8,000; special waivers allow up to 75%, 51–250 employees; up to 90%, 50 or fewer employees	Demand occupations offering full-time employment; not to exceed 6 months (individuals with significant barriers may receive 50% longer).
8	December 2009	50% of wage rate	Demand occupations paying more than minimum wage, with duration not less than 80 hours or more than 1,040 hours; incumbent workers eligible if they earn less than self-sustaining wages and can expect a wage increase of more than 5%; apprenticeship training eligible for \$5,000 a year/2 years.
9	September 2007	50% of wage rate	Occupations paying more than the prevailing wage as defined by Ohio Labor Market Information and offering at least 32 hours per week employment (with some exemptions); incumbent workers are eligible if they earn less than self-sustaining wages and can expect wage increase of more than 5%.
11		50% of wage rate	Duration is determined by the occupation for which the participant is being training and the skills of the participant; incumbent workers earning less than a self-sufficient wage are eligible; classroom training may be included if needed.
12	November 2010	50% of wage rate	Duration of 3 to 6 months, as appropriate to the occupation; wages and benefits equal to those of regular employees doing same work; no minimum wage or hours of work specified.
17	November 2009	50% of wage rate	Demand occupations paying more than \$8/hour and offering more than 32 hours/week; duration based upon difference between skill level needed and skill level possessed by customer; incumbent workers eligible if they earn less than self-sustaining wages.

State of Ohio policy

In April 2011 the state issued an On-the-Job Training Comprehensive Policy (Leftwich & Colbert, 2011). It reviews the federal OJT requirements, participant and employer eligibility, participant training plans, and fiscal and administrative requirements for OJT implementation. It also encourages local areas to make use of a waiver that permits a sliding scale for employer reimbursement of participant wages (above 50%) during training. The policy notes situations that may warrant using the sliding scale waiver, including (1) individuals facing significant barriers to employment; (2) small- and midsize businesses (a) offering an exceptional level of training, (b) providing benefits and a higher wage rate, (c) using expensive tools or equipment to provide training, or (d) providing significant workplace safety precautions and safety training; or (3) local areas with higher than average unemployment rates (Leftwich & Colbert, 2011). In addition, the state issued a 2009 OJT policy related to the NEG for Wilmington Airpark Dislocated Workers (ODJFS, 2011a).

Analysis of local area policies

There is consistency across the local area OJT policies in a number of areas:

- Most of policies have been adopted since 2009.
- All areas offer at least a 50% reimbursement to participating employers.
- Most require that the OJT be for a job paying more than a certain wage threshold and offering at least 32 hours a week of work.
- All areas cap OJTs at six months.

There are also variations across the policies (Table 10):

- Only three policies include the sliding scale for employer reimbursement permitted by the state waiver.
- The minimum wage threshold for the occupations for which participants are being trained include: more than \$8 an hour, more than \$10 an hour, more than minimum wage, and more than the prevailing wage as defined by Ohio Labor Market Information.
- Only one policy sets a *minimum* duration of training (80 hours).
- Two LWIAs include “reverse referrals” in their policies, which enable an employer to have an employee made WIA-eligible for the purpose of receiving OJT. Reverse referrals are accepted if the candidate is eligible for OJT and has participated in WIA core and intensive services and the employer agrees to accept referrals of other WIA candidates.

Policy questions raised

The review of On-the-Job Training policies raises the following questions, which can guide the development of effective and consistent statewide policy:

1. *Why do some LWIAs adopt a sliding scale wage reimbursement, whereas others do not?*
2. *How were OJT minimum wage thresholds determined? Why are they different across LWIAs?*
3. *What are the characteristics of the employees who received training? Has training led to increased wages and benefits?*
4. *Are there local areas where OJT is linked with a sector strategy or career pathway?*
5. *What are the characteristics of the employers who are using OJT? How has the OJT contributed to the success of their business?*
6. *What are the sanctions or consequences for employers who do not provide permanent jobs for OJT recipients?*

5. Observations and recommendations

In addition to providing a picture of selected LWIA policies, this research gave CRP insight into the process of creating, accessing, and using state and local WIA policy in Ohio. This section summarizes our observations from this research. It also includes recommendations for how the state can strengthen Ohio WIA policy in order to better serve the needs of workers, employers, and the workforce system.

Observations about LWIA policies

- A. LWIA policies are not easily accessible.** The state does not maintain a central repository of LWIA policies, and many local areas do not post policies on their websites or make them easily accessible to the public. In addition, some LWIA staff members were reluctant to share their policies, despite numerous requests and outreach efforts. Only 8 of 20 LWIAs provided CRP with requested policy documents, which limited our ability to draw definitive conclusions about the policy picture across the state.
- B. Policy documents range from very broad to extremely technical.** A number of LWIA policy documents made it challenging to answer the specific policy questions that were the topic of this research. Some documents were very general and lacking in specificity, whereas others included many pages of technical and administrative language. This raises the question of how understandable or useful the documents are to local workforce staff and customers. OJT policies, which address services for employers, are particularly complex.
- C. There are policy similarities across LWIAs.** Federal regulations, state guidance and policy, and reported “cross-pollination” across local areas have produced consistency in key components of many of the policies reviewed for the research. The greatest similarity was found in the Limited Funds/Priority of Service policies, where nearly all local areas set a Limited Funds threshold of 70% or more of funds expended/obligated.
- D. There are important differences in the policies.** Despite the similarities noted above, many aspects of WIA policies are very different across local areas. Some of the greatest variations are in ITA maximum training time limit and maximum training expenditure per client policies. There is also variation in the type and amount of Supportive Services provided by LWIAs and minimum OJT wage rates.
- E. There are cross-policy complexities and inconsistencies.** The review of this subset of local WIA policies surfaced cross-policy issues, most notably related to Supportive Services. For example, some ITA policies include Supportive Services as an allowable training expense, whereas others do not. Also, some LWIA Supportive Services policies state that funding for services is restricted (e.g., only certain activities funded or a dollar cap per individual) because of WIA funding limitations. However, the Limited Funds/Priority of Service policies for these same areas state that WIA funding is not limited until 60% to 70% of formula funds are obligated or expended. These issues create additional challenges to gaining a clear understanding of the local WIA policy landscape.
- F. Written policies are the starting point.** As would be expected, WIA policy documents leave room for discretion and interpretation. In addition, some local workforce boards further devolve policymaking to sub-areas, One-Stop operators, or county government. LWIA staff indicated that *how* policies are implemented is as important, if not more so, than *what* the policies say. Local workforce staff members emphasized that they focus on using available resources and building relationships in order to leverage and provide the best services possible within the constraints of WIA and state regulations.

G. The policy review raised as many questions as it answered. It was not possible, based on the review of written policies and clarifying conversations with state and local workforce staff, to determine which policies were the best and should be recommended for replication statewide. Additional research would be needed to answer these questions:

- *How, and to what extent, are the policies used?*
- *What was the basis for the policy parameters that were enacted?*
- *What is the impact of the policies on client services and outcomes?*

Addressing these questions, which were detailed throughout Section 4, should be a first step for the state in working with local areas to strengthen Ohio WIA policy.

Recommendations for state WIA policy

Although the focus of this report is on local area policies, state government can play an important role in assuring effective WIA policy statewide. Historically, there has been limited state WIA policy guidance in Ohio, with the state ceding nearly all policymaking to local areas. However, high unemployment and reduced WIA funding mean that state policies must guide locals to assure that limited resources are effectively spent, leading to higher skills and better employment outcomes for WIA participants. The policy letter issued by the state related to implementation of WIA ARRA funds provides a good starting point for state policies related to training, population targets, and supportive services (ODJFS, 2009).

The Working Poor Families Project (WFPF) has identified WIA policies that states should consider adopting to better serve adults with barriers to education and employment success (Table 11). The Ohio recommendations below reflect the findings of the current research as well as WFPF policy indicators.

A. Develop a state workforce policy context for local WIA policymaking. The state and local policy documents that CRP reviewed are compliance focused, generally established to meet or clarify state and federal regulations. They are not written within a broader context of a state vision and strategies to develop the Ohio workforce. One of the most important steps that the state can take is to collaborate with local areas to craft consistent statewide workforce policy. CRP believes that these policies should target WIA resources to better meet the needs of Ohio's low-income, low-skill adult workers. Policies that can help achieve that goal include the following:

1. Setting a lower threshold for WIA limited funds, at which point low-income and disadvantaged adults have priority in receiving Intensive and Training services
2. Requiring that a minimum percentage of WIA funds be spent on training activities and related Supportive Services.
3. Establishing criteria for the most effective way to use training funds (amount per individual, duration, provider, credential)
4. Linking WIA training funds to industry sector strategies and career pathways

B. Help local areas share best practices and establish effective policies. Local ITA and Supportive Services policies, as well as high thresholds for Limited Funds, appear to be crafted to ration scarce resources in order to serve as many customers as possible. Although this is consistent with WIA's emphasis on serving the universal customer, it may be inconsistent with achieving training and employment outcomes for customers with barriers to employment. Among the 17 ITA policies reviewed, CRP found 12 different duration/cost parameters, raising questions about the basis for these policy choices. The state should bring together local area policymakers to share policies,

challenges, and best practices and should provide guidelines, templates, and technical assistance to help them implement effective WIA policies within statewide policy parameters. The policy questions outlined in this research can provide a foundation for these efforts.

- C. Collect and report data on WIA expenditures by activity.** Local areas submit data to the state on required WIA performance measures, but local areas do not report expenditures by activity. A question that CRP first asked in 2004—*How much WIA funding in Ohio is spent on training?*—still cannot be answered (CRP, 2004). As a result, it is not possible to measure how the policies we reviewed impact local WIA expenditure patterns.⁵ LWIAs report that they have developed their own methods to track ITAs—numbers awarded, cost, training provider, funding streams—as well as a variety of other local metrics. However, this varies from area to area across the state. Lack of centralized reporting not only limits the ability of the state to measure performance but also makes it difficult for local areas to share data for program improvement.
- D. Reduce state-level program fragmentation.** Part of the policy fragmentation at the local level stems from program fragmentation at the state level. Local areas expressed concern about the numerous WIA-funded statewide “boutique” programs rolled out by various state agencies. Local areas must get up to speed quickly for each new initiative and make it work within WIA regulations. Instead, the state should use discretionary funds to support implementation of effective policies at the local level and enable local areas to provide additional services to workers and employers.

A foundation for the future

There may finally be serious efforts underway to introduce a WIA reauthorization bill. In June 2011, the Senate Committee on Health, Education, Labor and Pensions released a staff discussion draft of Title I of a WIA reauthorization bill. Although just a first step in the process, the purpose statements in the draft bill provide insight into where WIA may be heading:

1. Increase, particularly for individuals with barriers to employment, access to and opportunities for employment, education, training, and supportive services.
2. Support the alignment of the workforce investment, education, and economic development systems.
3. Improve the quality and relevance of workforce investment, education, and economic development efforts to provide workers with the skills and credentials they need to get and keep decent jobs, and to provide employers with the skilled workforce they need to succeed in the global economy.
4. Improve the delivery of services through the workforce development system for workers and employers.
5. Increase the prosperity of workers and employers; the economic growth of communities, regions, and states; and the global competitiveness of the United States.

The draft bill includes changes in performance measures, planning processes, regional geographies, and state and local roles and responsibilities to further the purposes outlined above. It also sets aside funds for new Workforce Innovation and Replication Grants (National Skills Coalition, 2011b).

Table 11. Working Poor Families Project WIA Policy Indicators

INDICATORS AND DEFINITIONS	
1. State mandates federal and state programs, beyond those required by WIA, to be formal partners in the One-Stop system.	The state has integrated key elements of its workforce development system in an effort to optimize resources and improve the delivery of services. At a minimum, formal partners should include TANF, Food Stamp Employment and Training, and the Carl D. Perkins postsecondary programs.
2. State uses alternative funding formula to allocate funds to local areas with excess poverty.	The state uses the provision in the WIA legislation that allows for 30% of the WIA funds that go to local areas for Adult and Youth services to be distributed through an alternative funding formula that recognizes the additional need of areas with excessive poverty.
3. More than 50% of WIA funds are dedicated to training.	The state requires local areas to spend at least 50% of their adult WIA funds for training activities.
4. State has policy for determining when local WIA training funds are limited and requires local WIBs to establish training priorities.	The state sets uniform policy for determining when local WIB Adult employment and training funds are limited and requires local WIBs to establish policies that set priorities for allocating Intensive and Training services for populations most in need of services.
5. State established training provider eligibility/performance criteria beyond WIA requirements and include data in consumer reports.	The state provides consumers with extensive data and information on training outcomes to better facilitate their choice of a training provider.
6. State requires local WIBs to do basic skills assessment for all customers without high school degree or GED and refer for adult education.	The level of cooperation required by the state between the state WIA/One-Stop system and the state's adult education program is high, with a particular focus on the extent to which the WIA/One Stop system is trying to serve individuals with low basic literacy skills.
7. State requires local WIBs provide funds for supportive services	The state has used its authority to mandate that local WIBs provide monies to participants for supportive services, such as childcare and transportation, when they are necessary for participants to complete intensive or training services.

Source. WFPF (2011).

This research can help Ohio prepare for the next generation of WIA. It raises important issues and questions that should be addressed by the state, local areas, and other key stakeholders working together as part of a statewide system:

- How do we want the Ohio statewide workforce system to look going forward? What should be changed? What should be preserved?
- How can we support policymaking tailored to needs of local economies and labor markets while assuring that customers have access to a predictable set of services no matter what “door” they use to enter the Ohio workforce system?
- Is Ohio poised to take advantage of the changes in WIA that are likely to result from reauthorization? If not, what needs to be done to get there?

Answering these questions can help Ohio develop a strategy to most effectively use shrinking federal workforce funds to improve the employability of Ohioans most in need of assistance and to provide Ohio employers with the skilled workers they need to be successful.

Endnotes

¹ Other sections of the Workforce Investment Act are Title II, adult basic education and literacy programs; Title III, Wagner-Peyser Act state employment services; and Title IV, vocational rehabilitation services.

² Detailed information about the Ohio WIA allocation formulas can be found in these ODJFS documents: Understanding the Allocation of Workforce Investment Act (WIA) Funds to Local Areas, PY2010 and PY2011, http://www.ohioworkforceboard.org/documents/GWPAB_Mettings/4-28-10/GWPAB-WIA-Formulas.pdf and Subrecipient Allocation Methodology, PY2010, http://ohiowfc.files.wordpress.com/2011/03/allocation_methodology_for_py2010.pdf.

³ The National Skills Coalition notes that WIA includes a sequence of services (core, intensive, training) to ensure that program participants only received higher-cost services, such as training, after failing to obtain employment through lower-cost services. However, 2009 USDOL guidance clarified that training and other services could be offered concurrently, sequentially, or in any order that meets the needs of the participant.

⁴ Funding for WIA nearly doubled under the American Recovery and Reinvestment Act (ARRA). However, ARRA WIA funding ended June 20, 2011, and regular formula funding has been steadily declining.

⁵ In 2009, the State of Ohio issued a policy requiring local areas to spend 30% of WIA stimulus funds on training. However, because Ohio does not require local areas to report how much they spend on training activities, it is not possible to know the extent to which local areas reached this goal or adhered to this policy.

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