



The Southwest Ohio Region
WORKFORCE INVESTMENT BOARD

In June 2021, Eligible Training Providers (ETP) will be requested to provide performance results in order to continue receiving or to meet future requirements for WIOA funding. The WIOA funding for **July 1, 2021 – June 30, 2022** is based on each ETP's successful completion of all steps in the application process (see page 3) along with a review of their performance results for 2020-2021.

Individual Training Accounts and Eligible Training Provider Process for Area #13

BACKGROUND / OVERVIEW

Historically under WIA, Ohio Workforce Areas varied in conducting their own review of Training Providers for eligibility in different ways, only relying on state registration systems. Now under WIOA, each state was required to develop comparative analysis of training, provide performance results and publicly publish the performance results to better inform customers. But the Department of Labor waived on this requirement and most, if not all, states chose not to review results in performance evaluations. The State of Ohio works with training providers to utilize into their state system "Workforce Inventory of Education and Training (WIET)". Accreditation confirmation is also required in the WIET process. This is the first step in the Ohio Eligible Training Provider process.

Area #13 accepts new applications for new Training Providers and re-certification of current Training Providers only once a year. The application and re-certification period under WIOA for the July 1, 2021 - June 30, 2022 program year to determine the approved training providers for the next year of funding begins **with the release of notification letters in June 2021**. Deadline for eligible training provider response is **July 15, 2021** for receipt of all requested data. Area #13 will conduct its ETP Evaluation Review Process in July and ETPs will be subsequently notified of their status in August. If and when the state of Ohio provides performance data by workforce area to local workforce boards and the general public, including both WIOA and non-WIOA funded individuals, Area #13 may adjust its annual evaluation process accordingly.

The Southwest Ohio Region Workforce Investment Board (SWORWIB), covering Ohio WIOA Area #13, is committed to supporting the technical training and upgrading of skills for as many Hamilton County employers and jobseekers as possible with limited funds. The goal of the Individual Training Accounts (ITA) training support is to improve *work-based* occupational skills in order to obtain employment; retain employment earn a high-demand credential, and earn a livable wage. **New training provider** applicants to Area 13 must provide evidence of meeting performance criteria *for at least two years* with customers of similar demographics as our WIOA customers. Current providers are required to provide our WIOA funded investments through customer-by-customer outcomes related to our criteria on an annual basis as part of their re-evaluation.

As the federal government determines public spending for workforce development funds, the availability of these funds may fluctuate or decrease, based on allocations. Funding fluctuations may impact Individual Training Accounts (ITAs) and/or On-the-Job Training (OJTs) as well as the WIOA funding to ETP's.

WIOA was signed into law by President Obama on July 22, 2014 and required evaluation of the completion and employment metrics of ETPs but also allowed states to obtain a waiver on the review and publication of results. But, the SWORWIB has conducted such evaluations since 2008 in order to encourage **“informed customer choice”** with our training investments. We look forward to the time that federal entities or Ohio's WIET system will provide the performance data in the future. The SWORWIB was influential with the Senate HELP Committee in the ETP evaluation and informed customer choice being included within WIOA of 2014 based in part on our practice of ETP performance evaluation.

The term **“informed customer choice”** does not mean “whatever the customer wants”. It means the SWORWIB has evaluated investments for 1) completion; 2) credential; 3) employment and 4) wages. The SWORWIB believes that both the federal government and State of Ohio government should care more about the immense college debt carried by Ohio College attendees, dropouts and graduates. After all, the college completion percentage in Ohio was only 55.4% in 2019 with transfers of 21.28% (according to college tuition compare.com). On the other hand, Ohio college graduates have more debt than those in many states despite Ohio's college tuition increasing at slower rates. The average student who graduated from an Ohio college or university in 2019 had \$30,629 in debt. That's \$278 more than a 2018 graduate and nearly a 5.5% increase from \$29,037 five years ago. It's also the 17th highest in the nation with Ohio graduates being the 8th most in debt (WalletHub studies).

Just as importantly, neither the US Department of Education nor the US Department of Labor actively evaluates colleges and college debt – probably because of a lack of knowledge or most of them went to college and do not understanding that workforce boards focus on employability over the ability to amass student loan debt. Consequently, the SWORWIB prioritizes industry recognized credentials that support getting employed rather than adding more debt for our customers. Furthermore, there are a myriad of other agencies and supports for college enrollment, but few workforce boards can credibly explain how few people are advancing into good employment if the Boards continue to cover highest college tuition, (with Mediocre outcomes) over in-demand industry recognized professional credentials (with high performance outcomes).

ELIGIBLE TRAINING PROVIDER (ETP) REGISTRATION AND LOCAL APPROVAL PROCESS

To avoid perceptions of conflicted interest or preferential treatment, the process of training provider eligibility is managed by the SWORWIB, which evaluates and confirms the approved providers for Area #13. Although reverse referrals from employers and trainers are not prohibited, historically, there have been issues raised about favoritism and inappropriate deployment of limited resources away from our service area, so the SWORWIB will evaluate volume of business with results for City of Cincinnati-Hamilton County residents and employers. The SWORWIB has been a leader and collaborator in Career Pathway and Industry Sector Partnerships since 1998. Training selections based on these initiatives are designed to serve employers and jobseekers rather than training

institutions unless required by foundation or state/federal governmental grant resources. Under those requirements, SWORWIB would defer to the funder expectation or selection. The OhioMeansJobs Center is responsible for career coaching, assisting eligible training customers, contracting and paying for training as well as obtaining and evaluating ETP data, resolving customer issues with training providers and confirming refunds from ETPs to the OMJ Center and reporting funds returned to the ETP committee, who will inform the board in their annual ETP Evaluation Report.

ETP APPLICATION STEPS

The following steps are required for all current and prospective WIOA Eligible Training Providers (ETPs) in Area 13 – Cincinnati/Hamilton County:

STEP 1.

Register as a training provider in Ohio, by visiting the state's WIET website at <https://owcms.ohio.gov/wiet/index.xhtml> and complete the registration process. Please note the WIET registration is a two-step process. First, the learning institution must be approved as an eligible training provider by meeting **all the required State of Ohio information**. Second, once approved as a training provider, the contact or authorized staff must login to add the program offerings. Please note that when adding programs, the provider cannot cut and paste a link to the course catalog. Each program must be entered separately as they are approved individually.

STEP 2.

Following your registration with WIET, please email a screenshot of your approved WIET status to admin@SWORWIB.org. **Registering and being listed as registered by the State of Ohio as a training provider does NOT mean you are approved to obtain training funds in Area # 13.**

STEP 3.

Once the programs have been entered and confirmation of entry completion obtained, please fill out and email the **ETP Performance Data Summary Sheet** found on SWORWIB.org and provide the required documentation listed in the top right-hand corner of the spreadsheet. The Training Provider will be expected to provide documentation of meeting the performance criteria listed below for the **past two years if a new provider to Area #13** and the last program funding year (ending June 30) for all existing training providers previously approved by the SWORWIB.

Please remember that being approved at the WIET state system level does NOT mean you are automatically approved to provide services in Area #13.

PRIORITIZED INDUSTRY SECTORS

WIOA requires Workforce Boards to prioritize training dollars to align with in-demand occupations and industries for economic development activities in the service area. This requirement is inherently aligned with our area focus on industry credentials recognized and desired by employers over distribution requirements for 2-year associates degree colleges and 4-year bachelor degree colleges evaluated by faculty instead of industry-recognized earned competency credentials. After careful research into the employment conditions and growth careers in WIOA Area #13, the Southwest Ohio Region Workforce Investment Board (SWORWIB) has approved the following prioritized Industry Sectors, all of which were also listed in our Southwest Ohio Regional WIOA Strategic Plan for 2017- 2021, and the revised plan for 2021-2025 that is posted on our website, www.SWORWIB.org. Currently the WIOA Regional Strategic Plan has been drafted and loaded for public comments. Thereafter an updated plan will be on the website for ETP interest in industry sectors. Those with an asterisk are sectors for which the SWORWIB partners with career pathway collaborative initiatives.

- Advanced Manufacturing (biomedical, aerospace, chemical, agri-flavoring and green)
- Business/Administrative Support/ Finance/Insurance Professions
- Advanced Manufacturing*
- Construction and Skilled Trades*
- Healthcare and Healthcare Support*
- Information Technology*
- Recreation and Hospitality; however at risk, due to COVID's impact on this sector
- Transportation, Distribution and Logistics (Supply Chain)*

PERFORMANCE OUTCOME CRITERIA REQUIRED OF TRAINING PROVIDERS

The goal of the Individual Training Accounts (ITA) training support is to improve work-based occupational skills in order to obtain employment via short term training and recognized credentialing. The Southwest Ohio Region Workforce Investment Board (SWORWIB) has established the following performance criteria for approval of new and re-approval of established successful Eligible Training Providers (ETPs):

1. The SWORWIB will accept **annual applications for Training Providers (new or renewal) only once a year.** The open eligibility application time frame is posted on www.SWORWIB.org under "Training Criteria"
2. The Training Programs approved must be within the SWORWIB established Priority Industry Sectors posted in the Regional Plan on the website and in alignment with state in-demand industries and occupations data and/or special grant focused occupations.
3. The Training Provider must provide documentation
 - **60% of WIOA funded customers COMPLETED**
 - **60% of WIOA funded customers RECEIVE AN INDUSTRY RECOGNIZED CREDENTIAL**
 - **60% of WIOA funded customers are EMPLOYED making at least \$15/hour**
4. The Training Provider must provide **documentation of the wages of those working customers. The SWORWIB aims for \$16.00 minimum starting wage after training, individually and by annual wage averages in part due to leading employers announcing**

higher wages. However, the SWORWIB recognizes, for some of our funding sources, such as TANF, or entry level healthcare have starting rates of pay that vary from \$10.00 - \$13.00.

5. The Training Provider must provide **proof of transferability of credits or recognition within the state stackable credentialing under the University System of Ohio or industry recognized certificates/credentials.**
6. The Training Provider must justify their charges as legitimate public value received based on a price analysis for training costs.
7. The Training Provider must have had a minimize the number of complaints and resolve these complaints to the satisfaction of the SWORWIB and OMJ Center.
8. The Training Provider must participate willingly and in a timely manner in data resolution, verifications, problem resolution, contracting and other documentation necessary to evaluate satisfactory performance for the use of public workforce training investments.
9. The Training Provider must be conveniently located to serve our customers in Cincinnati-Hamilton County, access to public transit will be essential.

ANNUAL ETP FORUM AND CONTRACTS

The contract for ETPs will be with the OMJ/One-Stop Operator and is an equivalent in order to obtain funding. An annual ETP forum in August will be jointly sponsored by the OMJ One-Stop Operator and the SWORWIB to review the policies, expectations, contract and payment procedures, as well as any updates related to the WIET system. ETP's approved for the coming year will receive an invitation to the annual ETP Forum.

DATA CONFIRMATION WITH THE OMJ CENTER FOR AREA #13 AND OTHER POLICY DETAILS FOR DATA SUBMISSION

For evaluation outcomes the SWORWIB uses data provided by the training provider and reviewed by the OMJ Center from information in the OMJ case management system recorded in the state database or other workforce data sources. ETPs are required to review their customer list with the OMJ Center in advance of submittal to the SWORWIB to ensure that **only Area #13 funded individuals** are listed for evaluation purposes. ETPs must be careful to be correct in their data provided for the evaluation process as the OMJ Center is expected to confirm the customers noted in the Area #13 data submission. Any errors or repeated customers already counted in prior year data evaluation that are subsequently submitted to the SWORWIB will be determined to reflect inadequate professionalism in customer management and record keeping related to the public's investments in Area #13 training activity. The SWORWIB also follows media stories and posted concerns about training institution practices and results of ongoing accreditations or closures.

ETPS WITHOUT AREA #13 ITA CUSTOMERS IN A GIVEN PROGRAM YEAR

If a previously approved ETP is not selected by any customer of Area #13 in the program year, the ETP Evaluation Committee will consider the ETP to be unapproved for the next program year. Should that ETP wish to reapply to Area #13 for approved eligible training provider status, the training provider will need to provide data on success with other Ohio WIOA areas or with similar customers and provide this information for their re-evaluation for consideration of being an Area #13 ETP.

FREE TRAINING POLICY

Training providers who provide free training for customers similar to WIOA customers will not be approved for fee-based training at cost to the SWORWIB, but rather customers seeking such training will be referred to the free providers. Training widely marketed as free for purposes of fundraising cannot then ask SWORWIB to pay for customers.

NEW TRAINING PROVIDER TO THE AREA #13 MARKET

In the event a new training provider or a provider that has not previously applied to Eligible Training Provider (ETP) status is interested in serving Area #13, they can submit performance data and curriculum information to the SWORWIB Executive, for preliminary review and consideration by the SWORWIB and OMJ Center in the event the training is relevant to the identified industry sectors and not otherwise available by the currently approved ETPs. In such situations a maximum of five (5) covered training for five separate trainee applicants can be authorized providing general statistics demonstrate satisfying performance results.

REFUND POLICY

The SWORWIB requires approved ETP's to adhere to our refund policy, rather than their individual practices. Our policy is to pay the ETP 50% of the total cost at enrollment and 50% at completion. Requests for exception with cause must be presented to the SWORWIB. Requests by the SWORWIB for ETP re-examination of refunds must also be considered.