



January 1, 2010

Workforce Investment Act Policy Letter No. 08-04.2

To: WIA Local Workforce Investment Boards (WIBs), Fiscal Agents,
Administrative Entities and One-Stop Operators

From: Lisa Patt-McDaniel, Director

Subject: National Emergency Grants (NEGs) - Individual Training Account (ITA) for
the Wilmington Airpark Dislocated Workers

I. Purpose

To identify the parameters for providing training through ITAs leading to employment and resulting in self-sufficiency for workers impacted by the Wilmington Airpark downsizing and served under the National Emergency Grant (NEG).

This NEG policy applies to all targeted participants served by the following Project Operators: Local Area 7 - Clinton, Montgomery, Highland, Greene, and Fayette; Local Area 12 - Butler, Clermont, and Warren; Local Area 1 - Scioto, Adams, Brown, and Pike; Local Area 13 - Hamilton; Local Area 11 - Franklin; and Local Area 20 - Ross, Fairfield, and Pickaway. In instances where a local WIB policy conflicts with this issuance, the NEG policy shall be followed when the service is paid with NEG funds. Workers impacted by the downsizing of the Wilmington Airpark who reside outside of the aforementioned areas should be referred to the Wilmington Airpark Transition Center to access available services. Out-of-area One-Stops may also make arrangements to access available NEG services through any one of the project operators.

NEG services are available to eligible dislocated workers identified in the approved NEG resulting from the downsizing of the Wilmington Airpark regardless of their counties of residence. Local WIBs outside of the project operators listed above may use local funds as appropriate, to serve this targeted group if accessing NEG-funded services is not feasible for the workers. Non-project operators may follow their local policies when using their local formula funds for impacted workers.

II. Effective Date

January 1, 2010

III. Background

NEGs are discretionary awards intended to temporarily expand service capacity at the state and local levels by providing time-limited funding assistance in response to significant dislocation events. In August 2008, the Ohio Department of Job and Family Services, Office of Workforce Development applied for NEG funds to aid the areas and workers affected by the downsizing of the Wilmington Airpark in Wilmington, Ohio. Due to the number of workers and counties impacted in Ohio, the state wants to ensure that workers will receive consistent services from the One-Stop center network, thereby providing a seamless transition regardless of the county of residence or local workforce investment area of the workers.

IV. Guidance Statement

An ITA is established on behalf of a dislocated worker to purchase a program of training services from eligible providers selected in consultation with the case manager. A program training services is defined by the Federal Register as one or more courses or classes, or a structured regimen that upon successful completion, leads to:

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

Training must lead to occupations that are in demand in the local area or an area where the participant is willing to relocate as approved by the board.

A participant services flow process that is responsive to NEG participants is a critical point to the success of serving these participants. The goal is to aid NEG participants' access to the services they want and need as quickly and easily as possible when the need for training has been identified. Although WIA requires a specific sequence of services (core, intensive, training), there is no mandated timeframe for them to be provided.

A. Time Limit

The maximum duration of an ITA may not exceed a twenty-four month period. Exceptions may be granted in instances where, through no fault of the student, the student is unable to complete the training as planned. Exceptions may include:

- Lack of availability of classes
- Cancellations of classes
- Unforeseen illness

Four-year degree programs may be funded when the customer can document that he or she is in the last two years of the program (i.e., remaining hours are equal to or less than fifty percent of the total hours required for the degree).

B. Fund Limitation

The maximum amount for an ITA may not exceed \$16,000 in WIA funds for a two-year program for tuition, books, and fees. Costs must be reasonable and necessary pursuant to 29 CFR, part 97.22. The cap does not include any supportive services related to the ITA such as supplies (i.e. uniforms, tools when absolutely required for the training). Exceptions to the financial cap may be made when the training program is a demand occupation in the medical field. Exceptions must be approved by the WIB designee or committee.

C. Demand Occupation

ITAs will be limited to occupations in demand within the local area or in the area in which the participant is willing to work or relocate. ITAs may also be issued to participants for occupations that are not in demand when there is a written guarantee of a job upon completion of training.

D. Access to Training

WIA is not an entitlement program. The issuance of an ITA must be based upon what is identified from the comprehensive assessment. If the worker is assessed and it is decided that training is required in order to obtain employment, an ITA may be issued.

ITAs are available to dislocated workers who have completed one or more intensive services and are unable to obtain employment leading to self-sufficiency. Training providers of occupational skills training and their programs of training services must be on the state eligible training provider list.

Key goals are:

- To ensure all eligible participants have the ability to benefit from services;
- Participants can successfully complete the program available;
- The services are aligned with the participants' career goals and objectives; and
- Participants make successful transitions into the workforce in competitive employment.

Participants in training must maintain a cumulative Grade Point Average (GPA) of 2.0 and must be considered full-time status as defined by the school. Part-time status may be approved if classes are unavailable or if extenuating circumstances exit with approval by a WIB designee or committee. Should a participant's GPA fall below the minimum 2.0, the participant will be considered on "academic probation" during the following term. If at the end of that term, the participant remains below a 2.0 GPA, the ITA will be terminated.

E. Assessment Requirements

A comprehensive assessment shall be conducted that includes at a minimum, a review of the following:

- Interests - Has the worker expressed a level of interest in the field or industry and is willing to complete the training necessary to transition into that type of employment?
- Basic skills - Does the worker have the reading, math, and other essential knowledge base to successfully complete the training?
- Occupational skills - Does the worker lack employment-specific skills needed to enter a new, in-demand occupation or industry, and will the approved training help address this deficiency?
- Prior work experience - Does the worker lack significant employment history that would limit his or her ability to obtain employment without additional training?
- Marketable skills - Does the worker possess skills that enable him or her to obtain desired employment that is available within a reasonable commuting area or an area in which the worker is willing to relocate?
- Aptitudes - Does the worker have the capacity to complete the training and perform the duties required of a particular occupation of interest?
- Supportive services needs - What type of support is needed to assist the worker in successfully completing the training program? What will the worker's means of support be should training be approved? Are sufficient childcare accommodations available?
- Barriers - Are there other barriers to employment that would increase the chances the worker will not successfully complete the training? What assistance is necessary to minimize any barriers that would prevent successful completion of training?

F. Pell and Other Applicable Grants

All available sources of funds, excluding loans, should be considered when determining the need for WIA funds. Participants must apply for Pell and all other applicable grants for qualifying programs. The WIA staff and the WIA participant should work collectively to calculate the total funding resources available as well as to assess the full education and education-related costs by creating a budget.

The budget should include the amount of the training costs, supportive services, and the participants' living expenses. Based on the information gathered in the budget process, WIA staff can determine the amount of WIA funds and supportive services that will be necessary for the participant to complete the training successfully. This also ensures that duplicate payments of training costs are not

made. The amount of WIA funded training may not simply be reduced by the amount of Federal student financial assistance as this is a violation of 20 U.S.C. 1087uu.

G. Reporting

All participants served under this NEG will be counted in statewide performance and must be entered in SCOTI WIA, Special Grants. Participants may be co-enrolled in local formula funded WIA programs. Co-enrolled participants will be counted in both statewide and local performance.

H. Local Implementation of NEG Policies

In order to access NEG funds for targeted individuals, local WIBs must pass a resolution to adopt the statewide NEG policies for targeted individuals or modify existing policies to adopt the statewide NEG policies.

I. Using Local Formula Funds

Local WIBs identified as project operators for this NEG may elect to serve eligible workers under the NEG using local formula funds if desired. In order to ensure consistent and equitable service delivery, local WIBs must, at a minimum, follow the guidelines of the NEG policies that apply to the targeted workers. If local policies exceed the financial caps for services or broaden the array of services, the local policies may be utilized when serving participants with local funds.

Affected workers served with local formula funds must be enrolled in SCOTI WIA, and identified by a unique code entered in the local use field in the basic intake screen as an individual covered under this NEG. Separate reporting requirements to further explain this process have been issued by the ODJFS, Office of Workforce Development.

V. Technical Assistance

For additional information, you may send your questions to the Office of Workforce Development: WIAQNA@JFS.OHIO.GOV.

VI. References

Workforce Investment Act of 1998, Public Law 105-220
Workforce Investment Act Final Rules, 20 CFR Part 652
USDOL TEGL 17-05, et al.
20 U.S.C. 1087uu
USDOL approved National Emergency Grant, Wilmington Airport