



Department of  
Job and Family Services

Ted Strickland, Governor  
Douglas E. Lumpkin, Director

August 31, 2009

**Workforce Investment Act Policy Letter No. 09-04**

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

From: Douglas E. Lumpkin, Director

Subject: Ohio's Career Advancement Accounts

**I. Purpose**

This communication provides state policy and operational parameters for the expansion of Ohio's Career Advancement Accounts (CAA) through the One-Stop service delivery system.

**II. Effective Date**

August 24, 2009

**III. Background**

On October 26, 2006, Ohio was chosen by the U.S. Department of Labor (DOL) as one of five states to participate in a two-year pilot program called "Career Advancement Accounts." In the first year of implementation, the program was designed to be a fast track to short-term training for workers impacted by the Ford Motor Company, General Motors and Daimler Chrysler plant closures or shift reductions; workers from supplier companies that were experiencing shift reductions; and workers from community businesses that were experiencing layoffs or closures as a result of auto industry declines.

In August of 2008, the process to expend \$3,000 per-year, per-participant was modified by DOL to allow \$6,000 per participant over a two year period, even if those costs occurred within the first program year. The CAA program is scheduled to end June 30, 2010.

Office of Workforce Development  
4020 E. Fifth Avenue  
P.O. Box 1618  
Columbus, Ohio 43216-1618  
jfs.ohio.gov

#### **IV. Policy Statements**

CAAs are individualized training accounts specifically targeted to Ohio's workers impacted by the downsizing and closures of companies and who have limited access to other training programs. CAA will be available and accessible through all One-Stop centers in Ohio and will focus on short-term training programs designed to enable eligible workers to gain marketable skills that will lead to new career opportunities or career advancement. One-Stops will ensure that eligible workers are informed of availability of CAA as well as of the full array of services offered through the One-Stop partners, including WIA Adult and Dislocated Worker programs. Through the provision of this information, workers will be prepared to make informed decisions on the type of services and training that are most effective for their situations and to make applications to the appropriate program or programs.

Local Workforce Investment Boards (WIBs) must review existing local policies to determine if additional policies are needed for successful implementation of CAA in their areas. To the extent possible, Ohio maintains the importance of local decision-making, while preserving the intent of the CAA program.

CAAs are to be available and implemented in a manner that is expedient and responsive to the impacted worker's needs. CAAs are outside the WIA program requirement of sequential services (core-intensive-training). All CAA participants must be determined eligible, approved for enrollment and complete training by June 30, 2010 in order to access CAA funds. Therefore, local areas are strongly encouraged to develop processes that do not unnecessarily impede access to training services.

##### **A. Eligibility**

1. CAAs are available to workers who are:
  - a) 18 years of age or over; and
  - b) U.S. citizens or authorized to work in the U.S; and
  - c) Properly registered for Selective Service; and meet one of the following listed in (d) through (f):
  - d) Laid off through no fault of their own due to plant closure or individual layoff; or
  - e) At risk of layoff and categorized as incumbent workers; or
  - f) Displaced homemakers.

On October 9, 2008, the Ohio Department of Job and Family Services, Office of Workforce Development issued a memo restricting the provision of CAAs to only workers impacted by Worker Adjustment Retraining Notification (WARN) mass layoffs or workers adversely impacted by recent domestic automobile manufacturing restructuring activities.

Workers who meet the criteria above and who are under a pending Trade Adjustment Assistance (TAA) petition, or are under an "appeal" of a DOL trade determination (where an employer or a representative has appealed denial of TAA) are eligible. However, if the workers are actively implementing their CAA and subsequently become TAA eligible, the CAA must be closed and workers must follow their TAA Re-Employment Plans.

The "self-sufficiency" screening required for employed applicants for WIA Adult and Dislocated Worker programs does not apply to CAA applicants, unless the CAA participant is co-enrolled in the WIA Adult or Dislocated Worker program for intensive or supportive services.

2. CAAs are not intended for workers who have ready access to other training assistance. Therefore, the following workers are not eligible to receive CAA:
  - a) Workers who have an ITA through the WIA Adult or Dislocated Worker program.
  - b) Workers who are eligible for TAA benefits through the Trade Act.
  - c) Workers who are under an "appeal" due to workers' non-adherence to their TAA Re-employment Plan.
  - d) Workers who are not eligible for Trade benefits due to factors other than lack of work separation (i.e. worker was terminated).
3. Local areas will determine if the worker meets the eligibility criteria listed above. WIA Adult and/or Dislocated Worker eligibility may be documented during the process of CAA determination, but is not required unless WIA core, intensive, or supportive services are planned.
4. Local areas may develop a priority of service policy in order to effectively manage the CAA program. The priority criteria may include the eligible worker category above (A (1) (d),(e) and (f)), the need of training to secure self-sufficient employment in a demand occupation, worker eligibility for buyouts, early retirement, or other resources such as Pell grants, etc. Local areas are reminded that veterans' preference is mandatory for all levels of services through federal employment and training programs, regardless of the other criteria in local priority policies.
5. Once the local area has identified a worker as eligible for a CAA, obtained sufficient documentation, and the appropriate data has been entered in SCOTI under the three basic intake screens, eligibility for this individual can be calculated in SCOTI. The date of eligibility becomes the approval date for the CAA

program and marks the beginning of the time-limited program duration.

## **B. Participant Agreement**

All applicants must sign a CAA participant agreement that ensures full understanding of training expectations and responsibilities, how the training will be funded, and obligations for reporting and follow up.

Local areas will develop CAA Participant Agreements that will include the worker's attestation that he/she will meet all conditions set forth in the local agreement. Local areas may incorporate language for CAA into existing agreements, or create specific agreements for the CAA program. Local areas may wish to consider language that addresses the following:

- Attendance requirements.
- Pass/Fail requirements.
- Communication and contact procedures with local area staff.
- Procedures for follow-up upon obtaining employment.
- Procedures for situations involving hardship and dropping out of the program.

## **C. Program Duration**

Use of individual CAAs will be approved for short-term training programs, on the condition that all training is completed by June 30, 2010.

## **D. Training Services**

The CAA program is to focus on short-term training, defined as less than one year in duration. Local areas may approve training using providers included in the Ohio Eligible Training Provider Online system or other training providers. However, all CAA training must lead to degrees, licenses, or industry recognized certificates or credentials. Selection of the training providers is determined at the local level.

Training requirements and limitations are as follows:

- a) Training may not exceed the limit of \$6000 per participant.
- b) WIA ITAs may not be utilized to supplement the cost of the CAA.
- c) Training must lead to attainment of a degree, a license, or an industry-recognized certificate or credential.
- d) Workers may re-apply for a CAA if failure to complete the program was due to hardship. Hardship will be determined at the local level.

## **E. CAA Account Awards and Management**

Local areas will determine the amount of the CAA obligation and forward requests to the ODJFS Office of Workforce Development for approval. Once approved at the state level, the local area will receive a confirmation

of the state's approval with an assigned number. Each week, the Office of Workforce Development will batch approved requests by area and request the Office of Fiscal Services to issue an allocation letter to the area. The allocation letter will reference the approved account numbers so that local areas can link customers to the allocation award.

Based upon the local procedures, the One-Stop systems will issue payments to vendors, and the local area fiscal agent will report the expenditures (both CAA account and CAA administrative costs) through the established County Finance System. Local areas are allocated up to 5% in administration for managing the CAA program.

#### **F. Co-Enrollment**

Local areas will ensure that eligible workers are informed of the wide array of services available through the One-Stop service delivery system and will promote maximum customer choice. Local areas may enroll WIA eligible CAA participants in the Adult or Dislocated Worker program, as appropriate, to provide registered core, intensive or supportive services that are needed to support the CAA and ensure successful completion of the training. WIA enrollment may continue beyond the completion of the CAA, based upon the needs of the workers.

CAA participants who are co-enrolled in the local WIA Adult or Dislocated Worker program will be included in all appropriate WIA performance measures.

CAA participants who are not co-enrolled into WIA Adult or Dislocated Worker programs will not be counted in the local areas' performance measures. Common measures, as defined in TEG 17-05, will be used to report outcomes for those participants enrolled only in CAA.

#### **G. Reporting**

The U.S. Department of Labor has established reporting requirements for all workers served in the CAA program. Initial CAA program data will be reported using the Sharing Career Opportunities and Training Information (SCOTI) system. Updates to the SCOTI system capture key and supplemental data, and will be rolled out to the local areas in phases.

Initially, SCOTI was updated to capture individual CAA participant's data including: intake, eligibility determination, acceptance or decline of the CAA offer, and training services selected.

Additional phases may incorporate exchanges of data between OJI (the state reporting system for Unemployment Compensation and the Trade program) and SCOTI.

Additional data, which is requested by DOL, must be reported by the local areas through alternative methods (paper forms, manual tracking, etc.). Detailed reporting instructions will be issued separately to the CAA points of contact.

## **H. Monitoring / Documentation**

ODJFS program and fiscal monitoring will be incorporated into the existing audits and program reviews to ensure data validation and adherence to CAA implementation policy and procedures.

Local areas may follow the guidelines established in WIATL 27, "Source Documentation for WIA Eligibility," for CAA general eligibility (Age, Authorization to Work, Selective Service Registration) documentation.

Suggested documentation for establishing dislocated worker or at-risk of layoff status include:

- Employer notice of layoff or pending layoff.
- Receipt of Unemployment Compensation (current recipient or exhausted UC).
- Self-attestation of layoff, at-risk of layoff, or displaced homemaker status.

For CAA participants who are co-enrolled in the WIA Adult or Dislocated Worker programs, local areas shall adhere to existing eligibility criteria and documentation requirements for these programs listed in WIAGL 6-2000, "WIA Eligibility Determination and Documentation," and WIATL 27, "Source Documentation for WIA Eligibility."

The State, DOL, or its contractors will be evaluating this demonstration program. In order to gather information for this purpose, local areas may be required to accommodate site visits by providing access to key personnel and necessary data.

## **I. Local CAA Contact Designation**

Local areas must establish a primary point of contact (POC) for the CAA program. An alternate POC is also required. This will provide a means for on-going communication between the Office of Workforce Development and the local area throughout implementation. Local areas must submit the primary and alternate POC for each One-Stop center in the area, and include the following:

- Name.
- Title.
- Agency.
- Workforce Area #.
- Address.

- Phone Number.
- Fax Number.
- E-Mail Address.

POC information is to be submitted via e-mail to:  
[WIAQNA@JFS.OHIO.GOV](mailto:WIAQNA@JFS.OHIO.GOV). Please insert this language in the subject line of the message: CAA POC.

## **V. Technical Assistance**

For additional information, you may send your questions to the Bureau of Workforce Services: [WIAQNA@JFS.OHIO.GOV](mailto:WIAQNA@JFS.OHIO.GOV), subject line: CAA.

## **VI. References**

Ohio Career Advancement Account Plan, February 2007  
U.S. Department of Labor, Training and Employment Guidance Letter (TEGL) 17-05, February 17, 2006.  
WIAGL 6-2000, [WIA Eligibility Determination and Documentation](#)  
WIATL 27, [Source Documentation for WIA Eligibility](#)  
Ohio Career Advancement Account Plan Modification, February 2008  
Ohio Career Advancement Account Plan Addendum, August 15, 2008  
USDOL Addendum Approval, August 18, 2008  
USDOL Grant Modification No. 7

Rescissions: WIATL 32B Ohio's Career Advancement Accounts