

Area 11: Local Policy

Eligible Training Provider Process

Purpose:

This policy provides guidance for the initial and subsequent determination of eligible training provider (ETP) eligibility, the federal and state requirements for training providers, performance standards, and data reporting.

Background:

A program of training services is one or more courses or classes or a structured regimen that provides the services that are listed in 20 C.F.R. 680.200 and leads to:

- A. An industry-recognized certificate or certification, a certification of completion of a registered apprenticeship, a license recognized by Ohio or the Federal government, or an associate or baccalaureate degree;
- B. A secondary school diploma or its equivalent;
- C. Employment; or
- D. Measurable skill gains toward a credential.

Policy:

I. Training Providers

A WIET Approved Training Provider Minimum eligibility requirements are as follows:

- A. The training provider must have a valid FEIN and be in good standing.
- B. The training provider must be accredited by a legitimate accrediting agency or an approved provider that offers the ability to take a state test for a license upon completion.
- C. The training provider must be registered with the Ohio Secretary of State unless it is an exempted institution, such as Title IV School, Ohio Technical Center, etc.
- D. The training provider must not have an active exclusion on the System for Award Management, or placed on the U.S. Department of Education's Debarment List.
The training provider must have been in business for at least two years at the time of their registration.

II. Types of WIET Approved Training Providers

There are nine classifications of Training Providers on WIET:

- A. Four-year university eligible to receive Title IV funds from Higher Education Act (HEA)
- B. Two-year university eligible to receive Title IV funds from Higher Education Act (HEA)

- C. Ohio Technical Center eligible to receive Title IV funds from Higher Education Act (HEA)
- D. Non-Ohio Accredited Postsecondary Vocational School
- E. Registered Apprenticeship program under National Apprenticeship Act
- F. Non-Registered Apprenticeship program
- G. Internship or Co-op
- H. Community-based Organization/Non-Profit
- I. Proprietary School/For Profit

III. Establishing Initial Eligibility of Local Training Providers

WIOA requires Workforce Boards to prioritize training dollars to align with in-demand occupations and industries for economic development activities in the service area. Therefore, the Workforce Development Board of Central Ohio (WDBCO) emphasizes Individual Training Accounts (ITA) that provide training opportunities to participants that lead to employment in an in-demand occupation/job.

The following are the industry sectors prioritized for training investments recognized for the Fiscal Years 2018 – 2028. WDBCO will apply these industry sector priorities through June 2028, as below or subsequently amended. ***Please reference the Area 11 ITA policy for additional information about industry prioritization.***

1. Advanced Manufacturing
2. Business/Administrative Support/ Finance/Insurance Professions
3. Construction and Skilled Trades
4. Healthcare and Healthcare Support
5. Leisure and Hospitality
6. Information Technology
7. Transportation, Distribution, and Logistics (Supply Chain)

WDBCO reserves the right to amend the list in response to shifting local labor market conditions and also reserves the right to approve special projects and customized training featuring training outside the list of target occupations/industries.

In-demand Occupations, or Top Jobs, strengthen Ohio’s current and future strategic economic advantage and empower people with 21st-century skills. These jobs have a sustainable wage and a promising future based on the projected number of openings and growth. The following criteria were used to define an “in-demand job” in Ohio:

- 80% of state median wage, \$14.10 per hour, or more;
- Annual growth in the number of jobs higher than the statewide average of 36; or
- Annual job openings greater than 584.

In addition to these state labor statistics and projections, electronic job posting trend data and business responses to Ohio’s In-Demand Jobs Survey are components in defining in-demand



jobs. Top Jobs can be found at <https://topjobs.ohio.gov/wps/portal/gov/indemand/top-jobs-list/ohios-top-jobs-list>

A. Initial Eligibility Requirements

1. Any provider offering a program of training services to be funded through WIOA using ITAs per **WIOAPL 16-02.2** must 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 that WIET registration is a two-step process.
 - a. First, the learning institution must be approved as an eligible training provider by meeting all the required State of Ohio information.
 - b. Second, once approved as a training provider, the contact or authorized staff must log in to add the program offerings. Please note that the provider cannot cut and paste a link to the course catalog when adding programs. Each program must be separately entered as they are approved individually.

Per WIOAPL 16-02.1, Any provider that has not previously served as an ETP under section 122 of WIOA or section 122 of the Workforce Investment Act of 1998 (WIA) must apply for consideration by submitting the program information listed in WIOAPL 16-02.2 section VI(D) in the State's designated online system for managing the State ETP list.

B. Continued Eligibility Requirements

Per **WIOAPL 16-02.2**, to remain active on the State ETP list and continue to receive WIOA funding, an ETP must renew its status in the State's designated system for managing the State ETP list at least once every 12 months following the date of the previous approval.

The renewal process requires an update of basic provider information, the information pertaining to each program offered by the ETP, and the indicators of program performance to reflect outcomes using the most recently available data that pertain to each performance measure (if such data are available) as required for performance reporting.

The State will review all submitted renewal requests and will terminate and remove providers that fail to meet the criteria necessary to remain eligible. The training provider will be notified via e-mail when its status has either been renewed or terminated.

If an ETP does not renew its status within 90 days following the 12-month renewal date, the provider will be terminated and removed from the State ETP list. The training provider will no longer be permitted to provide ITA services funded by WIOA until completing the initial eligibility process described above and obtaining ODJFS approval.

If an ETP does not renew the status of one or more of its training programs within 90 days following the 12-month renewal date for that program, the program(s) will be removed. The provider may remain on the State ETP list if it maintains at least one active



program. Providers with no available programs will be removed from the State ETP list as described in the previous paragraph.

A training provider must deliver results and provide accurate information to retain its status as an ETP. If a change should occur between eligibility review periods, training providers must immediately submit to ODJFS and WDBCO information regarding any changes in their eligibility, curriculum, price changes, and/or accreditation. Providers must disclose any factors that may change their eligibility status. Failure to do so may result in a finding of a substantial violation and removal from the State and local ETP list.

C. Additional Local Performance Requirements for Initial Eligibility and Continued Eligibility

Area 11 is not required to provide WIOA funding to a training provider listed on the State ETP list. Area 11 reserves the right to establish additional eligibility regarding how ETPs will be utilized locally. **Please note, 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 11.**

2. Area 11 places a higher emphasis on performance outcomes; therefore, following your registration with WIET, WDBCO requires that the training provider indicates in their application that:
 - a. 75% of students/customers completed training;
 - b. 75% of students/customers receive an industry-recognized credential (***Reference attachment A***);

As a part of their application, Training providers must also provide:

- c. Total number of persons enrolled in training;
- d. Total number of persons that received employment six months (two quarters) after completion of the training program.

The training provider must justify their charges as a legitimate public value based on a price analysis for training costs. If a training provider cannot meet the WDBCO performance outcomes listed above during the review process period, WDBCO may allow the training provider to be listed on the Area 11 approved training provider list for a probationary period. Upon the end of the probationary period, WDBCO will evaluate the ETP's performance and determine if they will remain on the Area 11 approved training provider list.

Note: If applicable, please provide the data above for the most recent program year.

The training provider must participate willingly and promptly in data resolution, verifications, problem resolution, contracting, and other documentation necessary to evaluate satisfactory performance for the use of public workforce training investments. The training provider must be conveniently located to serve customers in Franklin County, and access to public transit will be prioritized.

IV. Standardized Assessment

WIOA staff must determine, through evaluation or assessment of the individual, that the individual has the skills and qualifications to participate successfully and complete training. Including:

1. Adult and Dislocated Workers must have English reading, writing, or computing skills at or above the 6th grade level on a generally accepted standardized test; and
2. Adult and Dislocated Workers must have math skills at or above the 6th grade level on a generally accepted standardized test; or
3. Can compute or solve problems, read, write, or speak English at a level necessary to function on the job and pass standard certification tests.

If an ETP has an assessment that can be used in place of the locally used assessment, it must be submitted with the application for review and approval, otherwise, the local assessment used for appropriateness will be used.

V. Reimbursement

ETP's cost for service delivery will be reimbursed per student in the following increments:

- A. Start date - 50% (per student enrolled)
- B. Meeting at least one of the following milestones - 50% (per student who meets this milestone).
 1. Completion - student completes the program of study.
 2. Credential - student passes industry certification exam.
 3. Placement - student is employed within one quarter after the end date of the course of study.
 4. Wages - student earns a minimum rate of \$20.00 per hour within two-quarters of the end date of the course of study.

CEO may negotiate a different reimbursement structure with an ETP but must document reasons and the resulting new reimbursement structure. All requests must be submitted with the required ETP response to the secure DropBox located at WDBCO.org by the deadline described in sec. VI (B)(2) of this policy.

VI. Eligibility Exceptions

Work-based Training Programs

While work-based training programs may apply to be considered for the ETPL, per WIOA, certain work-based training programs are exempt from ETPL eligibility requirements. These programs may be eligible for WIOA funding utilizing a direct contract in lieu of being listed on the ETPL. These programs include:

1. On-the-Job Training (OJT)
2. Incumbent Worker Training (IWT)
3. Customized Training (this includes State Earn and Learn)
4. Internships
5. Transitional Employment
6. Paid or Unpaid Work Experience Opportunities

VII. Annual ETP Review

A. State Requirements

1. Please reference sec. III (B) on how to remain active on the State of Ohio ETP list

B. Local Requirements

1. The WDBCO will only review new and renewal eligibility applications for training providers once a year.
2. The annual deadline for each program year's eligible training provider responses is on or about May 1st for all requested data referenced in sec. III (c).
3. The WDBCO will conduct its ETP evaluation review process following the response deadline.
4. ETPs will be subsequently notified of their status on or about June 1st and will have until June 30st to appeal WDBCO's decision.
5. WDBCO will publish the final Area 11 approved training provider list on or about July 3rd.
6. Area 11 approved training provider list becomes active July 3rd.

WDBCO will not review an ETP's status as an eligible training provider if the required data referenced in sec. III (c) is not submitted to WDBCO by **COB on May 1, 2023** Any applications submitted afterward will not be reviewed, and the ETP will not be considered an Area 11 approved training provider. Area 11 reserves the right to conduct site visits to assess the providers' quality and report on the findings randomly or as a part of the annual ETP review.

Area 11 reserves the right to remove any approved training provider from the locally approved training provider list at any time. Upon removal, a written decision will be provided to the training provider.

VIII. Publishing the ETP

- A. When a training provider has been determined to be eligible and approved by the WDBCO, they, and their selected training programs, are added to the local list. The locally approved training providers are posted on the <https://www.wdbco.org/> and <https://ohiomeansjobs.ohio.gov/wps/portal/gov/omj/> website for easy access by participants and the public.
- B. Performance information on each program of training services will be maintained on <https://www.wdbco.org/> to help consumers make an informed decision.

IX. ETP Decision Appeals

All applications submitted to the WDBCO will be given fair and unbiased consideration. If a training provider applicant contests the decision not to award eligibility, the applicant may protest the Board’s decision to the CEO of WDBCO. The CEO will send all appeals to the WDBCO Job Center Committee, and the Committee will attempt to resolve all such disputes in a reasonable manner. Upon completion of the Committee’s review, a written decision will be provided to the applicant.

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Approved:

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Date:	01-26-2022	Date:	1/26/2022