

ATTACHMENT A
PROGRAM ADMINISTRATION DESIGNEES AND PLAN SIGNATURES

Name of WIA Title I Grant Recipient Agency and Administrative Agency:

Ohio Department of Job and Family Services
Address: 30 East Broad Street, 32nd Floor
Columbus, OH 43215-3414
Telephone Number: (614) 466-6283
Facsimile Number: (614) 466-2815
E-mail Address: Michael.Colbert@jfs.ohio.gov

Name of WIA Title I Signatory Official:

Michael B. Colbert, Director
Address: Ohio Department of Job and Family Services
30 East Broad Street, 32nd Floor, Columbus, OH 43215-3414
Telephone Number: (614) 466-6283
Facsimile Number: (614) 466-2815
E-mail Address: Michael.Colbert@jfs.ohio.gov

Name of WIA Title I Liaison:

Michelle Horn, Acting Deputy Director
Address: Ohio Department of Job and Family Services
4020 East 5th Avenue, Columbus, OH 43219
Telephone Number: (614) 644-5739
Facsimile Number: (614) 995-1298
E-mail Address: Michelle.Horn@jfs.ohio.gov

Name of Wagner-Peyser Act Grant Recipient/State Employment Security Agency:

Ohio Department of Job and Family Services
Address: 30 East Broad Street, 32nd Floor
Columbus, OH 43215-3414
Telephone Number: (614) 466-6283
Facsimile Number: (614) 466-2815
E-mail Address: Michael.Colbert@jfs.ohio.gov

Name and Title of State Employment Security Administrator (Signatory Official):

Michael B. Colbert, Director
Address: Ohio Department of Job and Family Services
30 East Broad Street, 32nd Floor, Columbus, OH 43215-3414
Telephone Number: (614) 466-6283
Facsimile Number: (614) 466-2815
E-mail Address: Michael.Colbert@jfs.ohio.gov

Name and Title of State Labor Market, Workforce Information, or Research

Director: Coretta Pettway, Labor Market Information Bureau Chief
Address: Ohio Department of Job and Family Services
4020 East 5th Avenue, Columbus, OH 43219
Telephone Number: (614) 752-9494
Facsimile Number: (614) 752-9627
E-mail Address: Coretta.Pettway@jfs.ohio.gov

Name of Title V of the Older Americans Act Grant Recipient/Lead Agency:

Ohio Department of Aging
Address: 50 West Broad Street, 9th Floor
Columbus, OH 43215-3363
Telephone Number: (614) 466-1055
Facsimile Number: (614) 995-1049
E-mail Address: BKantor.Burman@age.state.oh.us

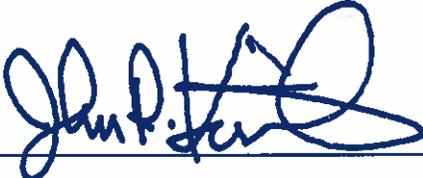
Name and Title of State Senior Community Service Employment Program Administrator (Signatory Official):

Bonnie Kantor-Burman, Director
Address: Ohio Department of Aging
50 West Broad Street, 9th Floor, Columbus, OH 43215-3363
Telephone Number: (614) 466-1055
Facsimile Number: (614) 995-1049
E-mail Address: BKantor.Burman@age.state.oh.us

As the governor, I certify that for the State of Ohio, the agencies and officials designated above have been duly designated to represent the State in the capacities indicated for the Workforce Investment Act, Title I, Wagner-Peyser Act grant, and Senior Community Service Employment programs. Subsequent changes in the designation of officials will be provided to the U.S. Department of Labor as such changes occur.

I further certify that we will operate our Workforce Investment Act, Wagner-Peyser Act, and Senior Community Service Employment programs in accordance with this Plan and the assurances herein.

Typed Name of Governor John R. Kasich

Signature of Governor  Date 9/13/12

Attachment B - 2011 Ohio Migrant Census

County	Total # of People	# Age 14 & older	Number of Families	Number of Camps
Adams	30	15	4	0
Allen	55	45	5	0
Ashland	10	6	2	0
Ashtabula	250	250	25	0
Brown	35	35	0	0
Butler	250	175	30	0
Champaign	185	140	32	1
Clark	550	410	45	2
Clinton	15	10	1	0
Columbiana	30	20	2	1
Coshocton	10	6	2	0
Crawford	45	30	5	1
Cuyahoga	425	350	15	0
Darke	200	148	15	3
Delaware	90	75	15	0
Erie	310	270	15	2
Fairfield	45	30	4	1
Franklin	245	175	30	0
Fayette	44	36	2	0
Fulton	155	120	20	1
Gallia	20	20	0	0
Geauga	9	9	0	0
Hancock	55	40	7	0
Hamilton	425	280	52	0
Hardin	45	30	4	0
Henry	275	210	40	2
Huron	1,250	905	135	7
Jackson	50	50	0	0
Knox	12	10	2	1
Lake	1,450	1,270	55	8
Licking	75	55	6	2
Lorain	600	600	15	4
Lucas	89	60	12	1
Mahoning	90	75	15	1
Marion	65	55	6	0
Mercer	115	85	9	1
Meigs	375	275	15	1
Miami	285	190	35	3
Ottawa	575	515	25	9
Putnam	420	340	35	5
Richland	25	14	4	0
Sandusky	1,615	1,225	185	21
Scioto	16	12	2	1
Seneca	470	310	65	5
Summit	6	4	1	0
Stark	550	475	85	10
Tuscarawas	58	40	6	0
Warren	12	8	3	0
Washington	50	50	0	1
Wayne	50	40	2	1
Williams	130	95	20	1
Wood	275	202	30	4
Total	12,516	9,895	1140	101

Note: The count is an estimate based on information from the Ohio Department of Health, Teaching & Monitoring Communities, Ohio Migrant Educations and the Ohio Department of Job and Family Services. Monitor Advocate/Ombudsman, April 2012.

Attachment C

2012 Ohio Agricultural Calendar

Animal Maintenance (breeding, feeding, sheering) 

Maintenance (blocking, cleaning, hoeing, pruning, spraying, staking, thinning, weeding) 

Planting 

Harvesting (picking, bailing) 

Crop	Counties	Acreage		Yield (lbs per acre)		Value (Thousand Dollars)		Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	
		2009	2010	2009	2010	2009	2010													
Alpaca	Erie																			
Apples	Erie Geauga Henry Lake Sandusky	6,800	6,300	17,000	13,200	38,682	26,836													
Asparagus	Geauga Hancock Henry Lake Sandusky Wyandot																			
Blackberries	Morrow Pike Richland																			
Blueberries	Erie																			
Butter Beans	Adams Athens Carrol Champaign Darke Knox Monroe Muskingham Tuscarawus Wayne																			

Crop	Counties	Acreage		Yield (lbs per acre)		Value (Thousand Dollars)		Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec		
		2009	2010	2009	2010	2009	2010														
		Trees	Erie Geauga Henry Lake									■	■	■	■	■	■	■	■		
Turnips	Defiance Summit									■	■	■	■	■	■	■	■				
Wheat	Hancock Sandusky Wyandot													■		■					

Attachment D

Profile of Ohio Agriculture 2010¹

Commodity	Unit	Ohio		State Ranked First	
		Rank ²	Prod. or Inventory ³ Thousand	State ²	Prod. or Inventory ³ Thousand
Field Crops					
Corn for grain	Bu	8	533,010	Iowa	2,153,250
Corn for silage	Ton	14	2,380	Wisconsin	14,250
Oats	Bu	10	3,500	Wisconsin	11,385
Winter wheat	Bu	11	45,750	Kansas	360,000
Soybeans	Bu	6	220,320	Iowa	496,230
All hay (baled)	Ton	20	2,871	Texas	10,800
All potatoes	Cwt	25	609	Idaho	114,400
Tobacco	Lb	8	5,125	N. Carolina	352,625
Fresh Vegetables					
Sweet corn	Cwt	6	1,224	Florida	5,894
Tomatoes	Cwt	4	1,269	California	11,970
Cabbage	Cwt	13	336	California	4,688
Total fresh vegetables	Cwt	13	4,932	California	212,937
Processing Vegetables					
Tomatoes	Ton	3	158.3	California	12,297.0
Cucumbers	Ton	6	21.6	Michigan	198.4
Total processing vegetables	Ton	7	179.9	California	12,480.3
Fruit					
Apples	Lb	9	83.2	Washington	5,500,000
All grapes	Ton	12	3.5	California	6,150
Processed grapes	Ton	11	3.0	California	5,194
Peaches	Ton	10	6.2	California	817.0
Strawberries	Cwt	8	35	California	25,829
Poultry and Poultry Products					
Chicken layers inventory 12/1/10	Head	2	28,272	Iowa	52,994
Chickens sold	Lb	9	34,132	Georgia	101,140
Broiler production	Lb	15	376,800	Georgia	6,882,700
Turkey production	Lb	10	177,560	Minnesota	1,207,900
Egg production 12/09-11/10 (million)	No.	2	7,535	Iowa	14,614
Livestock and Livestock Products					
Hog and pig inventory 12/1/10	Head	9	2,030	Iowa	19,000
Hog and pig production	Lb	9	1,049,685	Iowa	9,255,147
Cattle and calf inventory 1/1/11	Head	25	1,230	Texas	13,300
Cattle and calf production	Lb	28	431,197	Texas	6,789,818
Beef cow inventory 1/1/11	Head	29	290	Texas	5,025
Milk cow inventory 1/1/11	Head	10	270	California	1,750
Sheep and lamb inventory 1/1/11	Head	13	129	Texas	880
Sheep and lamb production	Lb	12	9,791	Colorado	60,300
Wool	Lb	14	625	Texas	3,630
Cattle slaughtered	Head	17	119.2	Nebraska	6,938.3
Hogs slaughtered	Head	13	1,055.6	Iowa	29,837.5
Calves slaughtered	Head	2	127.9	California	214.3
Sheep and lambs slaughtered	Head	15	15.4	Colorado	899.9
Red meat production	Lb	22	302,600	Nebraska	7,135,700
Livestock slaughter plants 1/1/11 (Not in thousands)	No.	3	143	Pennsylvania	214
Milk and Milk Products					
Milk production (million)	Lb	11	5,240	California	40,355
All cheese excluding cottage cheese	Lb	10	207,733	Wisconsin	2,609,861
Swiss cheese	Lb	1	150,487	Ohio	150,487
Creamed cottage cheese	Lb	5	17,285	New York	72,027
Cottage cheese curd	Lb	5	10,491	New York	112,820
Lowfat Cottage Cheese	Lb.	4	9,425	New York	117,861
Sour Cream	Lb.	4	58,084	New York	258,312
Manufactured dairy plants (Not in thousands)	No.	9	56	Wisconsin	210
Miscellaneous					
Number of farms 2010	No.	11	74.7	Texas	247.5
Honey production	Lb	24	1,054	N. Dakota	46,410
Maple Syrup	Gal	7	65	Vermont	890

^{1/} Data reported for 2010 unless noted otherwise in stub. ^{2/} Rank among the states based on total production or inventory. ^{3/} Thousand unless noted otherwise in stub.

ATTACHMENT E

State of Ohio Request for Waivers

1. Waiver Request: To waive the requirement for a 50 percent employer match for customized training and permit a match of not less than 10 percent to increase employer connections with the One-Stop system.

Background

Ohio would like to continue the waiver to change the required employer match for customized training from 50 percent of the cost to a minimum of 10 percent of the cost. This waiver has allowed our local areas to link to employers who have not been willing to work with them previously. The match will be determined based on a sliding scale based on the size of the employer: 1) no less than 10 percent match for employers with 50 or fewer employees, and 2) no less than 25 percent match for employers with 51-100 employees. For employers with more than 100 employees, the current statutory requirements (50 percent contribution) continue to apply.

This waiver encourages employers to participate in customized training by allowing greater flexibility in determining the employer match requirement. For the jobseekers or existing workers, this waiver affords them the opportunity to receive training, enhance existing skills, and acquire new skills and possible credentials. This waiver request follows the required format identified in WIA Section 189 (i)(4)(B) and WIA regulations at 20 CFR 661.420(c). This waiver supports the principles of increasing accountability; creating a stronger involvement of local boards and private sector and, increasing; and local flexibility.

Section I: Statutory or Regulatory Requirements to be Waived

Ohio requests waiver of Section 101(8)(C) of Workforce Investment Act (WIA), which requires employers to pay not less than 50 percent of the cost of training. In its place, the state is proposing the use of a methodology under which employers will pay between 10 to 50 percent of the cost of training based on the sliding scale proposed in the Background section above.

Customized training optimizes the employment and training resources available to meet the needs of potential employers and jobseekers. These resources train individuals for jobs that exist and for which employers are willing to make investments. Employer-driven customized training programs directly meet the needs of the labor market now and have the potential of meeting the needs of the future. These types of programs focus on employer and jobseeker requirements while minimizing programmatic and bureaucratic barriers.

The 50 percent match requirement limits a local area's ability to market customized training to potential employers. Local employers often conclude that the 50 percent required match is too much of a financial commitment. They acknowledge the benefits of obtaining a specifically trained individual, but indicate that costs often outweigh these benefits. The flexibility gives the LWIBs a tool to present a favorable picture of the

program. It affords local staff the flexibility of encouraging employers with jobs in-demand and in industries that are growing to participate in WIA.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

Ohio has been achieving, and expects to continue to achieve, the following goals:

- Broaden flexibility in engaging and working with business and industry to improve the skills of employers' workforce;
- Increase training for high-growth/high-demand occupations with the acquisition of appropriate credentials signifying transferable skills;
- Increase training for individuals with multiple barriers to employment;
- Improve ability of LWIBs to work with the private sector and to respond quickly to changes in their areas;
- Increase local flexibility for the design and control of training programs, and
- Provide layoff aversion strategies to allow retention of workers and enhance stability and competitiveness of businesses.

The purpose is to have as much flexibility as possible to accomplish goals and principles of the Workforce Investment Act (WIA) and enhance local boards' capacities to improve their workforce investment system. In order for Ohio to remain viable and competitive, changes are needed for business, industry, and individual communities.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and expects to continue to see:

- Increased entered-employment rates, retention rates, wage changes, and credential rates,
- Increased use of customized training as a training model,
- Meeting and improving employer satisfaction, and
- Meeting and improving customer satisfaction.

Section V: Individuals Impacted by the Waiver

Employers benefit from this waiver because of the reduced match requirement. This has in the past and will continue to make customized training an attractive option for obtaining and retaining employees trained to their specifications. By engaging in customized training through the employment and training system, they become more aware of the valuable resources that Ohio's One-Stop centers can provide.

Individuals have more access to skills training due to the increased access and availability of training resources for their employers. They are be obtaining new skills which lead to increased earnings, upgraded transferable skills, and credentials that help them advance within the company and/or obtain future employment should the present employment situation change.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The Ohio Department of Job and Family Services, Office of Workforce Development (OWD) is the state entity responsible for administering WIA, Wagner-Peyser and Veterans Programs. OWD also houses Workforce Systems, the integrated case management and reporting system that is used to track and monitor the changes and outcomes that are caused by this waiver.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis that serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

2. Waiver Request: To replace the statutory performance measures for activities under the Workforce Investment Act with the Common Measures as outlined in ETA Training and Employment Guidance Letter 17-05.

Background

Ohio would like to continue the waiver to allow the state to replace the seventeen WIA performance measures with the Common Measures in TEGE 17-05 (Adult Entered Employment Rate, Adult Employment Retention Rate, Adult Average Earnings, Dislocated Worker Entered Employment Rate, Dislocated Worker Employment Retention Rate, Dislocated Worker Average Earnings, Youth Placement in Employment or Education, Youth Attainment of Certificate or Diploma, and Youth Literacy and Numeracy Gains). Under this waiver, Ohio has been able to be able to simplify the reporting system by discontinuing the use of the seventeen statutory WIA measures and to fully implement the nine Common Measures. The State of Ohio believes that this simplified performance reporting system is crucial for the continued improvement of service delivery.

Section I: Statutory or Regulatory Requirements to be Waived

WIA Section 136(b) is requested to be waived.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no known state or local barriers to the implementation of this waiver.

Section III: Goals to Achieve Using the Waiver

By replacing the statutory WIA performance measures with the nine Common Measures, Ohio has been able to simplify the service delivery process as data collection, reporting and validation has been streamlined. In the past, Ohio would have to track and report on seventeen statutory performance measures. By reporting only on the nine Common Measures, Workforce Development resources are utilized in a more efficient way, as much of the confusion over data collection and reporting requirements have been eliminated. Staff has been able to devote much of the time that was previously spent on program outcomes, to improving service delivery and meeting the needs of businesses and individuals. Integration of performance measures has resulted in increased accountability and greater efficiency in the service delivery system as labor costs and paperwork are reduced.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and expects to continue to see:

- Approval of this waiver has eliminated the duplication of the data reporting requirements simplified the complicated Performance Management System;

- The application of Common Measures has shifted the focus of the adult programs to employment, and youth programs to education and skill attainment;
- Implementation of the Common Measures has facilitated the local areas in designing their programs to meet these new performance standards more quickly. Ohio has facilitated serving more out-school youth, and the move to Common Measures will continue to compel local areas to increase the numbers of out-of school customers, and
- The elimination of Employment and Credential Rate measure as a result of this waiver has generated greater flexibility for the local areas to plan OJT and Customized Training services.

Section V: Individuals Impacted by the Waiver

Individuals, employers and workforce development staff benefit from this waiver. By reducing the number of performance measures, case management is simplified and staff is able to provide better customer service by focusing on the needs of employers and individuals. Out-of-school youth will continue to benefit from the shift to Common Measures because some significant service barriers to serving this group have been eliminated.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The Ohio Department of Job and Family Services, Office of Workforce Development (OWD) is the state entity responsible for administering WIA, Wagner-Peyser and Veterans Programs. OWD also houses the Workforce Case Management System, which is the integrated case management and reporting system that is used to track and monitor the changes and outcomes that are caused by this waiver.

Ohio has made all changes necessary to report Common Measures.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The comment period was 30 days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

3. Waiver Request: Waive the 50% limit on reimbursement to employers for OJT

Background

Ohio would like to continue the waiver to permit an increase in employer reimbursement for OJT through a sliding scale based on the size of the business. Under the current waiver, the following scale is used: 1) up to 90 percent for employers with 50 or fewer employees, and 2) up to 75 percent for employers with 51-250 employees. For employers with more than 250 employees, the current statutory requirement (50 percent reimbursement) continues to apply.

Section I: Statutory or Regulatory Requirements to be Waived

WIA Section 101(31)(B) is requested to be waived in order to increase the employer reimbursement for on-the-job training.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no existing state or local statutory or regulatory barriers to the implementation of this waiver request.

Section III: Goals to Achieve Using the Waiver

OJT enhances the employment and training resources available to meet the needs of potential employers and trainees. These resources train individuals for jobs that exist and for which employers are willing to make investments. Employer-driven OJT programs directly meet the current needs of the labor market and provide the potential of meeting the employer needs of the future.

Almost 75 percent of Ohio's nongovernmental employers are small businesses that have less than 250 employees. Small businesses do not typically have a Human Resources Department that can provide extensive training to their employees which increases their cost of training to their new employees. The current 50 percent reimbursement limits the ability to market OJT programming to potential employers. Local employers often conclude that the 50 reimbursement limit is too little of a compensation to train inexperienced individuals. They acknowledge the benefits of training individuals for specific needed jobs but indicate that costs often outweigh these benefits. A sliding reimbursement fee schedule will give Ohio's local Workforce Investment Areas a tool to present a more favorable picture of the program and to encourage employers to hire one-stop customers first. It will afford local staff the flexibility of encouraging the OJT participation of employers with jobs in demands and in industries that are growing. Further, it will improve job placement performance for individuals that are hard to place.

By waiving the 50 percent reimbursement requirement local boards will be able to more effectively market OJTs to the employers in targeted growth industries and in-demand occupations. These proposals for the employer contribution are at rates that more appropriately represents a particular business' or industry's cost benefit ratio. The proposed changes to the reimbursement limit will increase the likelihood of job placement activity (both subsidized and unsubsidized).

The specific goals to be achieved by the waiver are to:

1. Improve the ability of the State of Ohio to respond to changes in employer and industry needs;
2. Increase control of program delivery and greater usage of OJT as a training strategy;
3. Increase Employer/Board collaboration to address industry needs and worker training;
4. Provide greater flexibility in designing and implementing WIA programs, and
5. Connect individuals with hiring employers.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and expects to continue to see:

Increased entered-employment rates, employment retention rates, wage gain rates, and increased use of OJT training as a training model.

Section V: Individuals Impacted by the Waiver

Employers will benefit from this waiver because of the increased reimbursement schedule. This will make OJT an attractive employer option for obtaining employees trained to their specifications. By engaging in OJT through the employment and training system, employers will become more aware of the valuable resources that the One-Stop can provide.

Individuals will benefit from this waiver because they will be afforded the opportunity to be trained for high growth/high demand occupations in industries that are expected to grow. They will be obtaining training signifying their acquisition of transferable and valuable skills that can help them obtain future employment should the present employment situation change. Individuals also benefit from having a direct connection with a hiring employer.

Individuals with multiple barriers to employment will benefit from this waiver since they will be an economic encouragement for employers to train these individuals for jobs with high potential for growth. OJT, as a training model, also offers a paycheck to the trainee. This aspect of OJTs is even more important as thousands of Ohio Unemployment Insurance claimants exhaust their benefits.

Local area One-Stop staff will benefit from this waiver by having an additional tool to offer individuals and employers that can be customized to meet mutual needs.

Local Area Workforce Board members will benefit from this waiver by having a firmer control on the services they can offer to employers and individuals. It is clear that this waiver will benefit a great number of people.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The Ohio Department of Job and Family Services, Office of Workforce Development (OWD) is the state entity responsible for administering WIA, Wagner-Peyser and Veterans Programs. OWD also houses the Ohio Workforce System, the integrated case management and reporting system that is used to track and monitor the changes and outcomes that are caused by this waiver, and OhioMeansJobs.com, the state's job search tool.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis that serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

4. Waiver Request: Allow transfer authority to permit up to 50% transfer of funds between adult and dislocated worker programs.

Background

Ohio would like to continue the waiver to allow local WIB (local board) to transfer up to 50 percent of funds between adult and dislocated worker programs, allowing greater flexibility to use available funding to increase services to the specific population when a need is identified.

Some local boards have challenges related to serving the dislocated worker population, while other local boards have challenges serving the adult population. The flexibility to transfer up to 50 percent of funds would allow ease in administration and a timely response to customers as program needs are specified.

The transfer of funds flexibility will be accompanied by a restrictive use of statewide reserves, inclusive of rapid response and 15% set-aside funds. For example, a local board may not transfer funds from dislocated worker to adult program without regard to ongoing and predictable demands for dislocated worker services in the local area. The state will not provide supplementary rapid response funds to address a predictable need. In cases where local boards choose to transfer large amounts of dislocated worker resources to the adult program, additional allocations to the local board will be restricted to significant unexpected layoffs which occur after the transfer takes place.

This waiver supports the principles of streamlining services; increasing accountability; creating stronger role for local board, and increasing state and local flexibility.

Section I: Statutory or Regulatory Requirements to be Waived

Workforce Investment Act (WIA) Section 133(b)(4) is requested to be waived, in order to increase the allowable transfer amount between Adult and Dislocated Worker funding streams allocated to a local area. A technical amendment, specified in the Training and Employment Guidance Letter No. 23-02, dated April 1, 2003, increased the transfer authority from 20% to no more than 30%.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

Ohio has been achieving and expects to continue to achieve the following goals:

- Allowing local boards to address needs of communities and employers, and

- Flexibility in determining use of funds and leveraging resources.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and expects to continue to see:

- Maximum use of resources,
- Increased customers' access to services, and
- Meeting expenditure requirements and obligations.

Section V: Individuals Impacted by the Waiver

Adults and dislocated workers have been and will continue to be impacted by this waiver.

Section VI: Process Used to Monitor Progress in Implementing the Waiver

The Ohio Department of Job and Family Services will continue to monitor implementation and impact of this waiver through a combination of reporting from the local level using the Ohio Workforce System client management information system and state monitoring, oversight and evaluation functions.

Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk top reviews and on-site compliance monitoring.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process for Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

5. Waiver Request: To waive the prohibition on the use of individual training account (ITA) for youth. This waiver permits the use of individual training accounts for older youth and out-of-school youth (16-21).

Background

Ohio would like to continue the waiver to allow the local boards to serve older youth and out-of-school youth with ease in administration and timely responses to customers. Currently a youth 18 or older may use an ITA if they are co-enrolled in an adult or dislocated worker program.

This waiver request supports the principles of streamlining services, individual opportunity and empowerment, customer choice, and an improved youth program by allowing the 16-21 youth population to benefit from services provided by Ohio's eligible training providers. Often, older youth and out-of-school youth need adult-like services and choices. This waiver encourages this youth population to seriously look at career paths and empowers them to make their own decisions, thereby taking responsibility for their actions. This waiver will be applied statewide.

This waiver request has supported the principle of accountability and ease of administration. Co-enrollment into the adult or dislocated worker program is not necessary under this waiver. The ITA could be issued from one funding source. Tracking costs on one funding source for the youth would increase accountability.

Section I: Statutory or Regulatory Requirements to be Waived

Workforce Investment Act (WIA) Final Regulations at 20 CFR Section 664.510 provides that an individual training account (ITA) is not allowed for youth, except that youth 18 and above may be co-enrolled in the adult or dislocated worker programs which require ITAs to receive a program of training services.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

Ohio has been achieving and expects to continue to achieve the following goals:

- Improving the ability of local boards to respond quickly to the needs of older and out-of-school youth and at-risk youth, ages 16-21;
- Treat youth ages 16 and older in an adult-like manner;
- Increasing youth access to One-Stop locations, services and information;

- Improving coordination by reducing fragmentation of service delivery;
- Improving customer choice and increase empowerment for youth making them capable and responsible for making intelligent choices about their career;
- Reducing unnecessary paperwork and number of records that co-enrollment registration creates;
- Developing the emerging workforce with prepared candidates ready for work, and
- Increasing accountability.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and expects to continue to see:

- Increased the quality of learning opportunities,
- Increased employment and training opportunities,
- Reduction in administrative burden by eliminating the need to track separate funding streams for one individual,
- Creation of one record for youth,
- Increased efficiency and customer choice, and
- Increased use of eligible training providers that require ITAs.

Section V: Individuals Impacted by the Waiver

Youth ages 16 through 21, (in-school and out-of-school), benefit from this waiver. In particular, out-of-school youth benefit. The administrative entity, One-Stop operator and youth providers are also benefitting.

Section VI: Process Used to Monitor Progress in Implementing the Waiver

The Ohio Department of Job and Family Services will continue to monitor implementation and impact of this waiver through a combination of reporting from the local level using the Ohio Workforce System client management information system and state monitoring, oversight and evaluation functions.

Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk top reviews and on-site compliance monitoring. OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process for Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site:

<http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

6. Waiver Request: Allow the option for local grant recipient/fiscal agent to conduct three youth elements or to competitively select service providers.

Background

Ohio would like to continue the waiver of the requirement for competitive procurement of service providers for three of the ten youth program elements. The three program elements that this waiver will apply to are: paid and unpaid work experience, supportive services, and follow-up services. This waiver is being asked to ensure coordination, continuity and ease of administration in providing youth activities.

The WIA youth program operates on the premise of long-term participation during which time strong relationship is likely to be formed. When a different youth provider must be sought through a competitive process the rendering of services is less effective and sometimes disruptive. The established relationship may not continue to exist and youth is likely to leave the program because of instability. When the case manager establishes relationship and is involved in keeping connection with customers' well being, follow-up services are more cost efficient, reducing dependency on using incentives to find customers. Local boards need the continued flexibility to determine which tasks of follow-up should be procured or conducted through an in-house operation.

Youth allocations are relatively small and having to procure for youth elements such as supportive services where much of the support is in the form of transportation, clothing, eyeglasses and tools is inefficient when these items can be secured through small purchases. In addition, when certain services are accessible from other sources, WIA does not need to provide the youth element until those resources are no longer available. Often, the time available to procure is limited, thus causing a disruption and fragmentation in delivery of services.

Procuring for work experience is difficult. This youth element is labor intensive, requiring time to go into the community to develop worksites and relations with employers. Having a third party go back into the community is less cost effective, and creating a separate provider delivery system has resulted in a fragmented delivery system.

This waiver is implemented statewide.

This waiver supports the principles of streamlining services, increasing accountability and accessibility, state and local flexibility and ease of administration.

Section I: Statutory or Regulatory Requirements to be Waived

Workforce Investment Act (WIA), Section 123 that requires that providers of Youth program elements be selected on a competitive basis.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

Ohio has been achieving and expects to continue to achieve the following goals:

- Continuity and greater efficiency of service delivery,
- Flexibility in deciding the elements that will be part of framework activities,
- Minimizing duplication of efforts,
- Decreasing in administrative costs to deliver services, and
- Greater integration of youth services into One-Stop locations.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and hopes to see for new activities:

- Quality service providers used for certain youth elements,
- Improved case management and follow-up services,
- Longer participation of youth, and
- Maximized use of resources.

Section V: Individuals Impacted by the Waiver

In-school and out of school youth will continue to be impacted by this waiver.

Section VI: Process Used to Monitor Progress in Implementing the Waiver

The Ohio Department of Job and Family Services will continue to monitor implementation and impact of this waiver through a combination of reporting from the local level using the Workforce Case Management System and state monitoring, oversight and evaluation functions.

Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk top reviews and on-site compliance monitoring. OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process for Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

7. Waiver Request: To waive the time limit on the period of initial eligibility for training providers.

Background

Ohio would like to continue the waiver of the time limit on the period of initial eligibility for training providers. This request concerns the length of time before subsequent eligibility for training providers is determined.

Training providers report difficulty gathering required performance data on WIA students as well as their entire program student population.

This waiver is applied statewide and supports the principle of state and local flexibility.

Section I: Statutory or Regulatory Requirements to be Waived

Waiver of the provision at 20 CFR 663.530 that prescribes a time limit on the period of initial eligibility for training providers.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

Ohio has been achieving and expects to continue to achieve the following goals:

- Reducing the burden and the costs of data collection placed on training providers with few WIA participants;
- Reducing the burden and the costs of data review and approval placed on local boards and the state;
- State and its partners have time to conduct analysis of available data to set meaningful and reasonable criteria for "subsequent eligibility";
- Identification of criteria that is useful to the business community, and
- Identification of entity that would be responsible for the consumer report.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio expects to see:

- More valid participant data to evaluate and establish appropriate levels of performance for subsequent training provider eligibility, and
- More accounting of WIA completers of training programs.

Section V: Individuals Impacted by the Waiver

Local boards, administrative entities, One-Stop operators, training providers, adult, dislocated workers and youth will continue to be impacted by this waiver.

Section VI: Process Used to Monitor Progress in Implementing the Waiver

The Ohio Department of Job and Family Services will continue to monitor implementation and impact of this waiver through a combination of reporting from the local level using the Workforce Case Management System and state monitoring, oversight and evaluation functions.

Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk top reviews and on-site compliance monitoring.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process for Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

8. Waiver Request: To permit the State to use up to 20% of dislocated worker funds to conduct Incumbent Worker Training to avert lay-offs.

Background

Ohio would like to continue the waiver to use up to 20% of local formula Dislocated Worker funds for Incumbent Worker Training for lay-off aversion.

This waiver supports the principles of increasing accountability; creating a stronger involvement of local boards and private sector and increasing state and local flexibility

Ohio has established policy and procedures related to this waiver. Please see Ohio WIA Policy Letter 09-09.3, Layoff Aversion Incumbent Worker Training using local formula funds available at:

http://emanuals.odjfs.state.oh.us/emanuals/GetDocument.do?doc=Document%28storage%3DREPOSITORY%2CdocID%3D%23Ref_WIAPL09093%29&locSource=input&docLoc=%24REP_ROOT%24%23Ref_WIAPL09093&username=guest&password=guest&publicationName=emanuals

As far as layoff aversion activities beyond IWT, the Rapid Response Procedures Manual contains information and guidance for local areas. The manual is available online at:

<http://www.ohioed.gov/misc/RRProcedureManual.pdf>. The term "Layoff Aversion" is used throughout the manual, but the section that focuses most on aversion strategies is pages 29 to 31.

Section I: Statutory or Regulatory Requirements to be Waived

Workforce Investment Act (WIA) Section 134 (a) to permit local areas to use a portion of local funds for incumbent worker training.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

In the use of this waiver Ohio has been achieving and expects to continue to achieve:

- Assisting employers to avert layoffs;
- Broader flexibility in engaging and working with business to improve the skills of employers' workforce;
- Helping workers continue their skill building and maximize their full potential, and
- Broader flexibility in engaging and working with business to improve the skills of employers' workforce.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

Ohio has seen and will continue to see the following possible outcomes for trainees as a result of an Incumbent Worker contract: Completed training programs, received vocational skill certificates, workers remaining employed with same business, workers receiving wage increases, receiving other certificates, workers received promotions, workers climb the career ladder, or workers received other positive outcomes.

The program as a whole has had and will continue to have the following outcomes:
Long-term retention in employment:

- Develop marketable, transferable skills for workers, and
- Avert real or potential layoffs.

Section V: Individuals Impacted by the Waiver

- Participating employers, and
- Employed individuals.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The Ohio Department of Job and Family Services, Office of Workforce Development (OWD) is the state entity responsible for administering WIA, Wagner-Peyser and Veterans Programs. OWD also houses Workforce Systems, which is the integrated case management and reporting system that is used to track and monitor the changes and outcomes caused by this waiver.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serve as a venue to address any issue with the implementation of this waiver.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

9. Waiver Request: To minimize the data capture requirements for Incumbent Worker Training participants.

Background

Ohio is requesting a continuation of the waiver to minimize the data capture requirements impacting Incumbent Worker Training Programs so that employers are not unnecessarily burdened with federal data requirements. The waiver permits the state to discontinue the collection of the following Workforce Investment Act Standardized Record Data (WIASRD) elements: single parent (117), unemployment compensation eligible status at participation (118), low income (119), TANF (120), other public assistance (121), homeless individual and/or runaway (125), and offender (126).

Previously, when using local funds to serve incumbent workers, a full WIA application was required. The application included all of the elements above as well as additional program elements such as education attainment levels, family status and income, among others. A full application is appropriate for WIA applicants who are seeking services through the One-Stop system. However, it is far too burdensome and overly intrusive for incumbent workers, when the employers are the primary customers, not the workers themselves.

During the implementation of Ohio's local Incumbent Worker Training Program, employers and local workforce areas have expressed concerns regarding the collection of data elements for incumbent worker program participants.

Listed below are some of the concerns that have been raised:

- Requesting family income from their employees is the single biggest objection. This is a major issue with many workers;
- Employers spend too much time talking to staff explaining why they need to provide this detailed data;
- Employees refuse to sign the forms or provide supporting documentation, believing this information may be shared or used in identity theft and employers do not want to be held accountable;
- When requiring copies of supportive documentation, other than the signed I-9, too much time is taken from the job. Employees forget to bring their documentation, or the employee is required in the field and misses the appointment which requires future appointments;

- Employers object to the requirement for each employee to sign an application. They prefer the business to provide minimal data and the company representative to sign the attestation statement. Many businesses have multiple locations and collecting the individual forms from each staff member is logistically cumbersome, and
- Obviously, as in most local workforce areas, the perceived "red tape" tied to government funding turns quite a number of employers off. Information is needed to justify expenditure of federal funds, but a number of employers find the documentation a burden and more troublesome than it is worth.

Section I: Statutory or Regulatory Requirements to be Waived

Ohio requests waiver of the federal reporting requirements 20 CFR 666 and 667.300(a) to reduce the collection of participant data for incumbent workers.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

In the use of this waiver Ohio has been achieving and expects to continue to achieve:

- Greater coordination of state and local workforce board activities with state and regional local economic development efforts;
- Greater demand-driven workforce system, in line with the training needs of Ohio's workforce, and
- Elimination of excessive data-capture requirements at the local workforce board when regional allocated funds are used to provide employed worker training.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

In the use of this waiver Ohio has seen and expects to continue to see:

- Increased entered employment rates, retention rates, and earnings, and
- Increased use of customized training and OJT training models.

Section V: Individuals Impacted by the Waiver

- Businesses participating in Incumbent Worker Training Programs have been and will be positively impacted by the waiver. Relieving the burden of collecting demographic data has streamlined the project for employers;
- Service has been and will be provided to increased numbers of individuals in need of training;
- Regional Workforce Boards improve linkages with employers and economic development in their areas, and
- The rate of investment of WIA funds has increased.

Section VI: Process Used to Monitor Progress in Implementing the Waiver

The Ohio Department of Job and Family Services will monitor implementation and impact of this waiver through a combination of reporting from the local level using the Workforce Systems client management information system and state monitoring, oversight and evaluation functions.

Monitoring of the waiver may be conducted through a variety of approaches that may include routine desktop reviews and on-site compliance monitoring. The state will compile a list of employers engaged in locally funded customized training programs and collect data to evaluate the impact of this waiver.

OWD has been monitoring the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

10. Waiver Request: To permit the State to use up to 20% of Rapid Response funds to conduct Incumbent Worker Training to avert lay-offs.

Background

Ohio would like to continue the waiver to request to use up to 20% of Rapid Response funding Incumbent Worker Training. Ohio is requesting this waiver for only lay-off aversion. This waiver supports the principles of increasing accountability; creating a stronger involvement of local boards and private sector and increasing state and local flexibility.

Ohio has established policy and procedures related to this waiver. Please see Ohio WIA Policy Letter 09-09.3, Layoff Aversion Incumbent Worker Training using local formula funds available at:

http://emanuals.odjfs.state.oh.us/emanuals/GetDocument.do?doc=Document%28storage%3DREPOSITORY%2CdocID%3D%23Ref_WIAPL09093%29&locSource=input&docLoc=%24REP_ROOT%24%23Ref_WIAPL09093&username=guest&password=guest&publicationName=emanuals

As far as layoff aversion activities beyond IWT, the Rapid Response Procedures Manual contains information and guidance for local areas. The manual is available online at:

<http://www.ohioed.gov/misc/RRProcedureManual.pdf>. The term "Layoff Aversion" is used throughout the manual, but the section that focuses most on aversion strategies is pages 29 to 31.

Section I: Statutory or Regulatory Requirements to be Waived

Workforce Investment Act (WIA) Section 134 (a)(1)(A) to permit a portion of the funds reserved for rapid response activities to be used for incumbent worker training.

Section II: State or Local Statutory or Regulatory Barriers Removed

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

Section III: Goals to Achieve Using the Waiver

In the use of this waiver Ohio has been achieving and expects to continue to achieve:

- Assisting employers to avert layoffs;
- Broader flexibility in engaging and working with business to improve the skills of employers' workforce;
- Helping workers continue their skill building and maximize their full potential, and

- Broader flexibility in engaging and working with business to improve the skills of employers' workforce.

Section IV: Programmatic Outcomes to Achieve Using the Waiver

Ohio has been achieving and expects to continue to see the following possible outcomes for trainees as a result of an Incumbent Worker contract:

Completed training programs, received vocational skill certificates, workers remaining employed with same business, workers receiving wage increases, receiving other certificates, workers received promotions, workers climb the career ladder, or workers received other positive outcomes.

The program as a whole has had and will continue to have the following outcomes:

- Long-term retention in employment,
- Develop marketable, transferable skills for workers, and
- Avert real or potential layoff.

Section V: Individuals Impacted by the Waiver

- Participating employers and
- Employed individuals.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The Ohio Department of Job and Family Services, Office of Workforce Development (OWD) is the state entity responsible for administering WIA, Wagner-Peyser and Veterans Programs. OWD also houses Workforce Systems, the integrated case management and reporting system that is used to track and monitor the changes and outcomes caused by this waiver.

OWD will monitor the implementation of this waiver through feedback from the local areas. Meetings between OWD staff, local board directors and administrative entities are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver. The state will compile a list of employers engaged in locally funded Incumbent Worker Training programs and collect data to evaluate the impact of this waiver.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

11. Waiver Request: Waive the requirement to conduct evaluations of workforce investment activities for adults, dislocated workers and youth

Background

Ohio would like to continue the waiver to exempt the state from the requirement to conduct evaluations of workforce investment activities for adults, dislocated workers and youth.

The reduction to five percent in the WIA allotment for Governor's Reserve funds restricts the state's ability to effectively fund and carry out all of the required statewide workforce investment activities.

Section I: Statutory or Regulatory Requirements to be Waived

Waiver of WIA Section 134(a)(2)(B)(ii) and 20 CFR 665.200 (d) to exempt the state from the requirement to conduct evaluations.

Section II: State or Local Statutory or Regulatory Barriers Removed

Waiving the requirement to conduct evaluations will enable the state to focus limited resources on other critical functions.

Section III: Goals to Achieve Using the Waiver

The state's goal in seeking this waiver is to ensure the state can prioritize the use of statewide funds for required and most essential statewide activities. The state's reduced funds are being used to cover the following required activities:

- a) Operating a fiscal and management accountability information system, based on guidelines established by the Secretary after consultation with the Governor, chief elected officials, and One-Stop partners, as required by WIA section 136(f), [WIA Sections 129(b)(2), 134(a)(2), and 136(e)(2)];
- b) Submitting required reports (WIA Section 136(f));
- c) Disseminating the list of eligible providers of training services (including those providing non-traditional training services), for adults and dislocated workers;
- d) Providing technical assistance to local areas that fail to meet local performance measures;
- e) Conducting required rapid response activities, as described in Section 665.310;
- f) Information identifying eligible providers of OJT and customized training;
- g) Maintaining a list of eligible providers of youth activities as described in WIA Section 123;

- h) Assisting in the establishment and operation of One-Stop delivery systems, in accordance with the strategy described in the state workforce investment plan. [WIA Section 112(b)(140)]; and
- i) Providing additional assistance to local areas that have high concentrations of eligible youth.

Sections IV. and V. do not apply.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The state will monitor progress and ensure accountability for Federal funds in connection with this waiver by reviewing monthly expenditure performance and other reports through regular contact with the ETA Regional Office liaisons and through its monitoring and performance accountability system.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

Estimated Costs to Carry Out the Required Activity for Which the Waiver is Needed

When the statewide funding was 15 percent, Ohio invested considerable staff time to the evaluation of each local Workforce Investment Area according to criteria established under a continuous quality improvement program known as the "Gold Standard." This included evaluation of services to employers, adults, dislocated workers and youth; surveys of customer satisfaction; and "secret shoppers." This cost totaled approximately \$210,000 per program year for portion of several staff positions. Ohio estimates that it would cost a comparable amount of money to conduct similar evaluations of local areas in the upcoming program years. In the past, Ohio also paid an independent contractor to conduct satisfaction surveys to a random sample of customers, which cost between \$232,000 and \$330,000 per program year.

How Statewide Funds Are Being Used (for both required and allowable statewide activities)

See Section III. above. Spending for statewide required and allowable activities totaled almost \$31.6 million in PY 2010 and went down to \$13.5 million in PY 2011.

How Funds Are Being Prioritized Across Activities

Funds are prioritized for activities stated in Section III. above which promote and ensure program accountability, integrity, and solvency.

The Extent to Which the Funding Levels are Insufficient to Cover the Activity for which a Waiver Is Requested

Ohio's statewide funds have gone from just over \$26 million in Program Year 2008 to under \$4.7 million in Program Year 2012. This is a reduction of 82 percent over just four years and a reduction of 11 percent in the last year alone. Funding is insufficient to maintain the evaluation of local One-Stops, which cost a minimum of \$210,000 per program year. Funding is also insufficient to administer customer satisfaction surveys, which previously cost Ohio between \$232,000 and \$330,000. Furthermore, there are no funds to evaluate new program strategies and initiatives, such as the Connecting the Dots From Foster Care to Employment and Independent Living initiative, which would cost over \$1 million if evaluated rigorously.

According to Ohio's PY 2011 WIA Financial Statement, statewide 15 percent expenditures totaled over \$13.5 million and funds obligated totaled over \$2.7 million. The carry forward into PY 2012 equaled \$8.8 million. With the addition of PY 2012 statewide funds of \$4.6 million, funds available total \$13.5 million.

State level costs to administer the program were approximately \$11.5 million in State Fiscal Year 2012. Ohio hopes to reduce that to \$8 million for this year. This includes approximately \$4 million for the Office of Information Systems costs for the electronic case management system and system infrastructure costs, plus \$2 million each for Fiscal and Monitoring Services and the Office of Workforce Development. A small additional amount is needed for other ODJFS functions such as Legal, Communications, and Employee and Business Services. Additional statewide activities which are required include the Governor's Executive Workforce Board (approximately \$400,000), OhioMeansJobs.com (WIA portion at almost \$800,000), Regional Coordinators at the Development Services Agency (approximately \$2 million), technical assistance vendor (approximately \$76,000) and a few small initiatives funded by carry-forward funds. Ohio anticipates that statewide expenditures for the current program year may total approximately \$12.8 million. This may result in less than \$1 million in carry forward into PY 2013. This would mean state level expenditures that totaled \$13.5 in PY 2011 would need to total approximately \$5 million in PY 2013. Because the projected costs for PY 2013 exceed the amount of anticipated revenue, Ohio absolutely needs to have carry forward. Therefore, Ohio is reducing overall costs, and some existing WIA costs will be re-directed to NEG, Rapid Response, and/or competitive grant activities, as allowable and available. Ohio must continue to reduce, wherever possible and permitted.

Anticipated Impact of Not Funding the Activity

Evaluation is a critical component of program services to Ohio's customers, especially in the current economy which demands new ways of coordinating and delivering

services with effective results. Ohio will continue to review program national and state evaluation reports to learn more about effective program practices. By doing so, Ohio anticipates that there will be no impact on programs or participants.

How the Waiver, if Approved, May Directly Affect WIA Participant Services

As stated above, WIA participant services will not be directly impacted.

Other Methods Utilized

Ohio is using many additional methods to build evaluation into activities, without using statewide funds. The state actively pursues additional funding opportunities and builds evaluation into those proposals. For example, a Workforce Innovation Grant was recently awarded to ODJFS with a rigorous evaluation component included. The state is also establishing working relationships with universities to assist with designing and/or conducting program evaluations. For example, Cleveland State University is providing free evaluation services for the pilot programs to establish and provide One-Stop services for prisoners prior to release. The university benefits by having real, relevant research opportunities for students, and ODJFS benefits by having a strong evaluation component at no cost. In addition, The Ohio State University is assisting with a small-scale evaluation design for the Connecting the Dots initiative for youth emancipating from foster care

Furthermore, during the upcoming program years, the state is investing additional time and resources to analyze existing data and creating state metrics. These activities are designed to produce statistical data regarding service delivery strengths and weaknesses, but may not rise to the level of conducting formalized program evaluations. For example, ODJFS, in collaboration with the Workforce Investment Board Directors collaborative, is piloting a Return on Investment Model related to Dislocated Worker training services. Beyond this, the state is looking at occupational categories that yield a positive result compared with the training investment. The state is also seeking customer feedback through on-line chats in OhioMeansJobs.com and through regional forums across the state. The state metrics are designed to achieve substantially similar results to those outlined under 665.200.

12. Waiver Request: Exempt the state from the requirement to provide incentive grants to local areas

Background

Ohio would like to continue the waiver to exempt the state from the requirement to provide incentive grants to local areas. The reduction to five percent in the WIA allotment for the Governor's Reserve funds restricts the state's ability to effectively fund and carry out all of the required statewide workforce investment activities.

Section I: Statutory or Regulatory Requirements to be Waived

Waiver of WIA Section 134(a)(2)(B)(iii) and 20 CFR 665.200 (e) to exempt the state from the requirement to provide incentive grants to local areas.

Section II: State or Local Statutory or Regulatory Barriers Removed

Waiving the requirement to provide incentive grants will enable the state to focus limited resources on other critical functions.

Section III: Goals to Achieve Using the Waiver

The state's goal in seeking this waiver is to ensure the state can prioritize the use of statewide funds for the required statewide activities deemed most essential. The state's reduced funds are being used to cover the following required activities:

- a) Operating a fiscal and management accountability information system, based on guidelines established by the Secretary after consultation with the Governor, chief elected officials, and One-Stop partners, as required by WIA section 136(f), [WIA Sections 129(b)(2), 134(a)(2), and 136(e)(2)];
- b) Submitting required reports (WIA Section 136(f));
- c) Disseminating the list of eligible providers of training services (including those providing non-traditional training services), for adults and dislocated workers;
- d) Providing technical assistance to local areas that fail to meet local performance measures;
- e) Conducting required rapid response activities, as described in Section 665.310;
- f) Information identifying eligible providers of on-the-job training and customized training;
- g) A list of eligible providers of youth activities as described in WIA Section 123;

- h) Assisting in the establishment and operation of One-Stop delivery systems, in accordance with the strategy described in the state workforce investment plan [WIA Section 112(b)(140)]; and
- i) Providing additional assistance to local areas that have high concentrations of eligible youth.

Sections IV. and V. do not apply.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The state will monitor progress and ensure accountability for Federal funds in connection with this waiver by reviewing monthly expenditure performance and other reports through regular contact with the ETA Regional Office liaisons and through its monitoring and performance accountability system.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

Estimated Costs to Carry Out the Required Activity for Which the Waiver is Needed

Ohio estimates that providing incentives to local areas would cost at least \$200,000, given the local areas' historical performance attainment levels. To be effective and truly an "incentive" to change behavior, the incentive award would likely need to be larger, such as \$400,000 to \$600,000 or more.

How Statewide Funds Are Being Used (for both required and allowable statewide activities)

See Section III. above. Spending for statewide required and allowable activities totaled almost \$31.6 million in PY 2010 and went down to \$13.5 million in PY 2011.

How Funds Are Being Prioritized Across Activities

Funds are prioritized for activities stated in Section III. above which promote and ensure program accountability, integrity, and solvency.

The Extent to Which the Funding Levels are Insufficient to Cover the Activity for which a Waiver Is Requested

Ohio's statewide funds have gone from just over \$26 million in Program Year 2008 to under \$4.7 million in Program Year 2012. This is a reduction of 82 percent over just four years and a reduction of 11 percent in the last year alone. Funding is insufficient provide incentive grants to local areas.

According to Ohio's PY 2011 WIA Financial Statement, statewide 15 percent expenditures totaled over \$13.5 million and funds obligated totaled over \$2.7 million. The carry forward into PY 2012 equaled \$8.8 million. This carry forward plus new PY 2012 and FY 2013 statewide funds of \$4.6 million totals \$13.5 million funds available.

State level costs to administer the program were approximately \$11.5 million in State Fiscal Year 2012. Ohio hopes to reduce that to \$8 million for this year. This includes approximately \$4 million for the Office of Information Systems for the electronic case management system and system infrastructure costs, plus \$2 million each for Fiscal and Monitoring Services and the Office of Workforce Development. A small additional amount is needed for other ODJFS functions such as Legal, Communications, and Employee and Business Services. Additional statewide activities which are required include the Governor's Executive Workforce Board (approximately \$400,000), OhioMeansJobs.com (WIA portion at almost \$800,000), Regional Coordinators at the Development Services Agency (approximately \$2 million), technical assistance vendor (approximately \$76,000) and a few small initiatives funded by carry-forward funds. Ohio anticipates that statewide expenditures for the current program year (assuming the requested waivers are approved) may total approximately \$12.8 million. This may result in potentially less than \$1 million in carry forward into PY 2013. This would mean expenditures that totaled \$13.5 in PY 2011 would need to total no more than \$5 million in PY 2013. Because the projected costs for PY 2013 exceed the amount of anticipated revenue, Ohio absolutely needs to have carry forward. Therefore, Ohio is reducing overall costs, and some existing WIA costs will be re-directed to NEG, Rapid Response, and/or competitive grant activities, as allowable and available. Ohio must continue to reduce, wherever possible and permitted.

Anticipated Impact of Not Funding the Activity

It is anticipated that there will be no impact on programs or to participants. As stated below, Ohio is pursuing non-financial methods of providing recognition for outstanding programs and achievements. WIA requires incentive grants to areas for regional cooperation, for local coordination and for exemplary performance on the performance measures. These activities are part of the core business of workforce areas and may not be the best metrics for which an incentive grant is awarded. For example, for PY 2011, six areas exceeded all nine performance measures. Two of those areas served far fewer participants than comparable areas who did not exceed all measures. When looking at positive job placements (the numerator for adult and dislocated worker measures) many of these areas placed far fewer individuals in jobs than other areas of similar size. The state recognizes that all WIBs have strengths and weaknesses.

Ohio's goal is to benchmark activities in order to nurture the strengths. The incentive grant strategy is in contrast with the current approach of serving customers and getting the results the customers need.

How the Waiver, if Approved, May Directly Affect WIA Participant Services

As stated above, WIA participant services will not be directly impacted. Ohio will continue to measure performance.

Other Methods Utilized

Ohio is using many additional methods to provide recognition and to highlight outstanding programs and achievements. The state is developing a model to measure Return on Investment, supporting regional and cross-program, and encouraging interagency coordination as detailed in Sections I and II of the Integrated Workforce Plan. Opportunities for peer-to-peer recognition are also provided by featuring outstanding programs in statewide technical assistance video conferences, for example. We chose pilot locations for the Connect the Dots initiative by surveying local areas and county children services agencies and selecting those with demonstrated cooperation between WIA and foster care services. In addition, we are providing access to additional sources of funding to areas and programs demonstrating positive results. Examples of this include special grants for career pathways, business engagement, and the TANF summer youth employment program.

13. Waiver Request: Exempt the state from the requirement to disseminate training provider performance and cost information.

Background:

Ohio would like to continue the waiver to exempt the state from the requirement to disseminate training provider performance and cost information.

The reduction to five percent in the WIA allotment for Program Year 2011 Governor's Reserve funds restricts the state's ability to effectively fund and carry out all of the required statewide workforce investment activities.

Section I: Statutory or Regulatory Requirements to be Waived

Waiver of 20 CFR 665.200(b)(3) to exempt the state from the requirement to disseminate training provider performance and cost information.

Section II: State or Local Statutory or Regulatory Barriers Removed

Waiving the requirement to disseminate training provider information will enable the state to focus limited resources on other critical functions.

Section III: Goals to Achieve Using the Waiver

The state's goal in seeking this waiver is to ensure the state can prioritize the use of statewide funds for the required statewide activities deemed most essential. The state's reduced funds are being used to cover the following required activities:

- a) Operating a fiscal and management accountability information system, based on guidelines established by the Secretary after consultation with the Governor, chief elected officials, and One-Stop partners, as required by WIA section 136(f), [WIA Sections 129(b)(2), 134(a)(2), and 136(e)(2)];
- b) Submitting required reports (WIA Section 136(f));
- c) Disseminating the list of eligible providers of training services (including those providing non-traditional training services), for adults and dislocated workers;
- d) Providing technical assistance to local areas that fail to meet local performance measures;
- e) Conducting required rapid response activities, as described in Section 665.310;
- f) Information identifying eligible providers of on-the-job training and customized training;
- g) A list of eligible providers of youth activities as described in WIA Section 123;

- h) Assisting in the establishment and operation of One-Stop delivery systems, in accordance with the strategy described in the state workforce investment plan. [WIA Section 112(b)(140)], and
- i) Providing additional assistance to local areas that have high concentrations of eligible youth.

Sections IV. and V. do not apply.

Section VI: Process to Monitor the Progress in Implementation of the Waiver

The state will monitor progress and ensure accountability for Federal funds in connection with this waiver by reviewing monthly expenditure performance and other reports through regular contact with the ETA Regional Office liaisons and through its monitoring and performance accountability system.

Section VII: Process to Provide Notice to Local WIBs and Opportunity to Comment

Workforce development stakeholders were notified of the proposed waiver request through an E-mail alert regarding the new State Plan and waiver requests. The E-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on our web site: <http://jfs.ohio.gov/owd/WorkforceProf/waivers>. The public comment period was open for thirty days.

Waiver Questions, Comments Received, and the State's Responses

No comments were received on this waiver request.

Estimated Costs to Carry Out the Required Activity for Which the Waiver is Needed

Ohio estimates that disseminating training provider performance information would be in the \$1 million range because of necessary data collection. Performance data does not exist for some programs, and training providers have reported great difficulty in gathering performance data on WIA students. That is why Ohio has also requested the waiver of the time limit for eligible training providers. The state's eligible training provider list contains nearly 1,500 in- and out-of-state providers. Expending considerable resources to acquire and disseminate provider outcomes is not justified, given that fewer and fewer participants are being placed in long-term training services. During the two week period ending on October 12, 2012, less than 4,000 participants were enrolled in training services. As indicated in Sections I and II of the Integrated Workforce Plan, Ohio favors a strategic focus on direct placements and short-term training to meet the specific job requirements of employers that are hiring. However, Ohio does provide and will continue to provide direct links to provider websites, so cost information related to tuition, fees, books, and fees is available on-line.

How Statewide Funds Are Being Used (for both required and allowable statewide activities)

See Section III. above. Spending for statewide required and allowable activities totaled almost \$31.6 million in PY 2010 and went down to \$13.5 million in PY 2011.

How Funds Are Being Prioritized Across Activities

Funds are prioritized for activities stated in Section III. above which promote and ensure program accountability, integrity, and solvency.

The Extent to Which the Funding Levels are Insufficient to Cover the Activity for which a Waiver Is Requested

Ohio's statewide funds have gone from just over \$26 million in Program Year 2008 to under \$4.7 million in Program Year 2012. This is a reduction of 82 percent over just four years and a reduction of 11 percent in the last year alone. Funding is insufficient to undertake the collection and dissemination of training provider performance information.

According to Ohio's PY 2011 WIA Financial Statement, statewide 15 percent expenditures totaled over \$13.5 million and funds obligated totaled over \$2.7 million. The carry forward into PY 2012 equaled \$8.8 million. This carry forward plus new PY 2012 and FY 2013 statewide funds of \$4.6 million totals \$13.5 million funds available.

State level costs to administer the program were approximately \$11.5 million in State Fiscal Year 2012. Ohio hopes to reduce that to \$8 million for this year. This includes approximately \$4 million for the Office of Information Systems for the electronic case management system and system infrastructure costs, plus \$2 million each for Fiscal and Monitoring Services and the Office of Workforce Development. A small additional amount is needed for other ODJFS functions such as Legal, Communications, and Employee and Business Services. Additional statewide activities which are required include the Governor's Executive Workforce Board (approximately \$400,000), OhioMeansJobs.com (WIA portion at almost \$800,000), Regional Coordinators at the Development Services Agency (approximately \$2 million), technical assistance vendor (approximately \$76,000) and a few small initiatives funded by carry-forward funds. Ohio anticipates that statewide expenditures for the current program year (assuming the requested waivers are approved) may total approximately \$12.8 million. This may result in potentially less than \$1 million in carry forward into PY 2013. This would mean expenditures that totaled \$13.5 in PY 2011 would need to total no more than \$5 million in PY 2013. Because the projected costs for PY 2013 exceed the amount of anticipated revenue, Ohio absolutely needs to have carry forward. Therefore, Ohio is reducing overall costs, and some existing WIA costs will be re-directed to NEG, Rapid Response, and/or competitive grant activities, as allowable and available. Ohio must continue to reduce, wherever possible and permitted.

Anticipated Impact of Not Funding the Activity

It is anticipated that there will be no direct impact on programs or to participants.

How the Waiver, if Approved, May Directly Affect WIA Participant Services

As stated above, WIA participant services will not be directly impacted. Ohio will continue to provide cost information online so participants can make informed choices.

Other Methods Utilized

WIA staff and service providers will continue to monitor student success to avoid using training providers that have poor performance records.

Attachment F

Summary of Comments on Integrated Workforce Plan Program Year 2012 – Program Year 2016

COMMENT

Commenter #1 - Recommended adding information about the Workforce Innovation Grant involving Areas 1, 6, 16, 17, 18, & 19

Commenter #2 - Supported information in the plan about centralized data collection and reporting, development of a Business Forecasting Tool to help assess business workforce needs, and allocation of resources for the unemployed. Described the resources available through career-technical education. Asked a question regarding wages for projected job openings.

Commenter #3 - Suggested edits for consistency in figures and grammar.

Commenter #4 - Suggested seeking input from business owners in determining needs, aggressively marketing programs to private industry and business owners, guaranteeing the quality of the workers completing programs, adding "other" to the target industries, raising the youth common measures standards, and starting mentoring sooner for youth in foster care.

Commenter #5 - Commended the state for developing an integrated plan with SCSEP, including development of entrepreneurship to aid older workers, and providing electronic links that make the plan user friendly.

ACTION TAKEN

Information was added in Section II.E.2.

Responded to commenter and provided more information about the inventory of workforce programs and services and labor market information resources regarding wages.

Changes were made to the plan.

Responded to commenter and provided more information about the input being sought from businesses, marketing plans, rationale for performance standards, and mentoring plans. Indicated that comments would be taken into consideration as more details about implementation of the strategies in the plan are determined.

Responded and thanked for the review and comment.

Commenter #6 - Supported the charge of the Governor's Office of Workforce Transformation related to consistent policies, eligibility, and centralized data collection and reporting; commended the move to a single seeker record; encouraged continued streamlining of OJT administrative processes; recommended mandatory certification training for One-Stop staff to provide career guidance; and recommended adding legal services to the ex-offender service strategy.

Responded to commenter and forwarded recommendations to the appropriate program staff for further consideration.

Commenter #7 - Recommended specific actions to meet employer needs by assuring incumbent worker strategies are relevant and accessible to workers in entry-level positions and available to small- and medium-sized employers. Recommended that the state implement regional sector strategies, assure low-income individuals have supports, integrate adult basic education and literacy into all programs, establish accountability for training investments, assure monitoring of Rapid Response services and promotion of layoff aversion, and expanding integration of WIA and Trade.

Responded to commenter, provided additional information about improved Rapid Response monitoring and layoff aversion, and forwarded comments to the appropriate program staff for further consideration as further details of implementation of strategies identified in the plan are developed.

Commenter #8 - Provided information about Pennsylvania's Industry Partnership and studies relevant to the state skill gap and occupational projections. Encouraged increasing employer accountability, moving low skilled workers into skilled work, and continuing service provision at brick and mortar One-Stops even as Ohio increases virtual services. Commended the plan's focus on building networks, increasing collaboration, and expanded data collection and management.

Responded to commenter and forwarded comments to the appropriate program staff for further consideration as further details of implementation of strategies identified in the plan are developed.

Commenter #9 - Recommended inclusion of community-based small businesses that target needs of persons with mental illnesses and substance use disorders in creation of vocational rehabilitation policies and strategies; inclusion of community-based private organizations with behavioral health expertise in planning services to employers; and development of policies and resources that promote equitable pay for behavioral healthcare professionals. Supported the plan's inclusion of initiatives targeted to transition-age youth in foster care and recommended integration of vocational rehabilitation/behavioral health services.

Responded to commenter and forwarded the comments to the appropriate program staff for further consideration as further details of implementation of strategies identified in the plan are developed.

Commenter #10 - Supported the state's workforce vision, branding plans, and incumbent worker training. Rrecommended use of return on investment as a performance standard, more timely sources of labor market data, use of assessments and industry-recognized certifications, and clarification of the term "workforce professional."

Responded to commenter, clarified the role of the Department of Education and the Board of Regents identified in the plan, and forwarded the comments to the appropriate program staff for further consideration as further details of implementation of strategies identified in the plan are developed.

Commenter #11 - Indicated that the local WIB was currently responsive to changing economic conditions and expressed concern with the plan's references to regional workforce plans.

Responded to commenter and reiterated the importance of addressing regional needs.

Commenter #12 - Indicated belief that the coordinated development of the plan and strategies will meet the needs of SCSEP-eligible participants and their communities.

Responded to commenter and expressed thanks for input during plan development.

Commenter #13 - Indicated ample opportunity to provide input, comments, and recommendations in a variety of ways and indicated that the plan was well researched and written.

Responded to commenter and expressed thanks for input during plan development.

Attachment G
Executive Briefings for Program Years 2009 & 2010
(Methodology in effect until changed)

Executive Briefing
Workforce Investment Act Allocation Formulas
March, 2009

One important function of the Governor's Workforce Policy Advisory Board is to assist the Governor in the development of the allocation formulas for distribution of funds to local workforce investment areas. Allocation formulas may be amended only one time per program year. For the program year that begins July 1, 2009, Ohio is still awaiting funds available in the three funding streams: adult employment and training; dislocated worker employment and training; and youth. The FFY 09 budget was just passed in the Omnibus Budget Bill in late February. Ohio is expecting to receive a slight increase in funds due to the formula allocation factors. The federal appropriation level is the same as the FFY 08 budget.

The Department of Labor Requirements for the Allocation Formulas

The WIA legislation and regulations require that the Governor establish allocation formulas and publish the formulas in the State Plan. Funds must be allocated according to the following prescribed methods.

Adult Funds

The Governor must use either the formula the legislation details or an alternate formula developed by the Governor.

Ohio has used the formula in the legislation since WIA's inception. The Office of Workforce Development recommends continuing to use this formula in program year 2009. There are three factors considered in the formula, and each factor determines 1/3 of the allocation to each local area. The factors are:

- **relative number of unemployed individuals in areas of substantial unemployment**, compared to the total number of unemployed individuals in areas of substantial unemployment;
- **relative excess number of unemployed individuals in each workforce investment area**, compared to the total excess number of unemployed individuals in Ohio; and
- **relative number of disadvantaged adults in each workforce investment area**, compared to the total number of disadvantaged adults in Ohio.

Furthermore, a local workforce investment area's "share" of the funds must at least 90% of the prior year's "share." This is often referred to as WIA's "hold harmless" provision. There is also a 130% share stop-gain provision.

Youth Funds

The Governor must use either the formula detailed in the legislation or an alternate formula developed by the Governor.

Ohio has used the formula in the legislation since WIA's inception. The Office of Workforce Development recommends continuing to use this formula in program year 2009. There are three factors considered in the formula and each factor determines 1/3 of the allocation to each local area. The factors are:

- **relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area**, compare to the total number of unemployed individuals in areas of substantial unemployment in Ohio;
- **relative excess number of unemployed individuals in each workforce investment area**, compared to the total excess number of unemployed individuals in Ohio; and
- **relative number of disadvantaged youth in each workforce investment area**, compared to the total number of disadvantaged youth in Ohio.

Like adult allocations, a local workforce investment area's "**share**" of the funds must be at least 90% of the prior year's "**share**" with the 130% stop-gain provision.

Note: The "hold harmless" provision for youth and adults should not be misinterpreted to mean that a local area must get at least 90% of the **total funds** received the prior year. Example: If a local area's share of the total adult funds available is 4% of all adult funds for the state, then that area must get at least 90% of 4% the following year, or 3.6% of all adult funds for the state. The 130% stop gain works the same way to limit the ceiling of available funds. This provision is intended to prevent large annual fluctuations.

Dislocated Worker Funds

The WIA legislation requires the allocation formula for dislocated workers to include seven specified factors, and the Governor determines the weight each factor has in the formula. For Program Year 2007, the Office of Workforce Development recommends continuing to use the weights that have been utilized for the last five program years. The factors and the weights are below:

1. Relative number of unemployed insurance claimants	5%
2. Unemployment concentrations	20%
3. Plant closings/mass layoffs	5%
4. Mass layoffs	5%
5. Declining industries	5%
6. Farmer-rancher economic hardship	5%
7. Long-term unemployment	55%

There is no hold harmless provision for dislocated worker allocations.

**Program Year 2010 Workforce
Investment Act Allocations**

State of Ohio

April 28, 2010

Background Facts

- WIA Funds are allotted annually by the U.S. Department of Labor to States based upon a formula specified in Federal law.
- For Program Year 2010 (State Fiscal Year 2011), despite the fact that the total funds available Nationally to allot to states remained constant from last year, Ohio received reductions in each of the three funding streams totaling approximately \$12.8 million or 9.1%.
- There are different formulas for the three funding streams of WIA: Adult, Youth and Dislocated Workers.
- Upon receipt of the State allotments, the State is required to distribute 85% of the adult and youth monies and 60% of the dislocated worker monies to local areas based on a formula similar to the federal formula.
- The Governor's Workforce Policy Advisory Board has some flexibility to vary the formula to be used for a maximum of 30% of the funds for adult and youth, (70% of the funds must be allocated based on the federal formula) but any factors used in the revised formula must relate to excess unemployment or poverty and be included in the State plan and approved by the Secretary of Labor.
- For the Dislocated worker funding stream, the State develops an allocation formula based on factors prescribed in federal law, but those required factors can be weighted at the discretion of the state.
- Funding formulas are developed by the State workforce Board and recommended to the Governor for approval and inclusion into the Annual Plan.
- The State workforce board has not developed alternative funding formulas for the Adult and Youth funding streams, so the entire allocation to locals is based upon the formula included in federal law.
- The State Workforce Board approved factor changes to the Dislocated Worker formula several years ago after considering a number of optional weighting systems and comparing Ohio's formula to that used by neighboring states.

Can we change the formula now?

The current formula criteria are attached on the following pages. Changing the formula is a complex process that must weigh the needs of the state as well as the needs of individual areas. Starting that process in response to specific area reductions would significantly delay the award of funding to local areas and complicate their contracting processes immensely. In order to align the consideration of formula changes with the planning cycle of the workforce delivery system, research and deliberation of changes should occur in the summer and autumn months leading to decisions to modify the state plan in the winter. In this manner, approval can be secured in time to use the revised formula without delaying the allocation of funds to the local workforce areas.

Subrecipient Allocation Methodology

(For Program Year 2010 Allotments)

FUNDING STREAM	FACTORS	DEFINITIONS	HOW DETERMINED	DATA SOURCE
<p>Youth</p> <p>WIA Federal Regulations Part 667.130 (Administrative Provisions)</p>	<p>1. 1/3 of the available funds allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area, compared to the total number of unemployed individuals in areas of substantial unemployment in Ohio.</p>	<p>Unemployed individuals = any individual who is without a job and who seeks and is available for work.</p> <p>Area of substantial unemployment = an area that has experienced an average unemployment rate of 6.5 percent or more for the most recent 12-month period for which data is available at the time of allocation.</p> <p>Excess number = the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the State or the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in such State.</p>	<p>Most current 12-month period data.</p> <p>July through June 12-month average.</p> <p>Most current 12-month period data.</p> <p>July through June 12-month average.</p>	<p>Labor Market Information (LMI)</p>
	<p>2. 1/3 of the available funds allocated on the basis of the relative excess number of unemployed individuals in each workforce investment area, compared to the total excess number of unemployed individuals in Ohio.</p>	<p>Excess number = the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the State or the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in such State.</p>	<p>This number will vary upwards and downwards with the local unemployment rate, unless such rate falls below 4.5 percent.</p> <p>Most current 12-month period data.</p> <p>July through June 12-month average.</p>	<p>Labor Market Information (LMI)</p>
	<p>3. 1/3 of available funds allocated on the basis of the relative number of disadvantaged youth in each workforce investment area, compared to the total number of disadvantaged youth in Ohio.</p>	<p>Disadvantaged youth = an individual who is age 16 through 21 who received an income, or is a member of a family that received a total family income, that in relation to family size does not exceed the higher of the OMB poverty level or 70 percent of the Lower Living Standard Income Level.</p>	<p>Calculated based on decennial census data. As a result, these change only once every ten years and then remain constant until the census economic data become available from the next census.</p>	<p>2000 Census Data</p>

Subrecipient Allocation Methodology

(For Program Year 2010 Allotments)

FUNDING STREAM	FACTORS	DEFINITIONS	HOW DETERMINED	DATA SOURCE
<p style="text-align: center;">Adult</p> <p style="text-align: center;">WIA Federal Regulations Part 667.130 (Administrative Provisions)</p>	<p>1. 1/3 of the available funds allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area, compared to the total number of unemployed individuals in areas of substantial unemployment in Ohio.</p>	<p>Unemployed individuals = any individual who is without a job and who seeks and is available for work.</p> <p>Area of substantial unemployment = an area that has experienced an average unemployment rate of 6.5 percent or more for the most recent 12-month period for which data is available at the time of allocation.</p>	<p>Most current 12-month period data. July through June 12-month average.</p> <p>Most current 12-month period data. July through June 12-month average.</p>	<p>Ohio ASU Data</p> <p>Ohio ASU Data</p> <p>Information related to Ohio's 88 Counties plus separate city information for Columbus, Cleveland, and Cincinnati</p>
	<p>2. 1/3 of the available funds allocated on the basis of the relative excess number of unemployed individuals in each workforce investment area, compared to the total excess number of unemployed individuals in Ohio</p>	<p>Excess number = the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the State or the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in such State.</p>	<p>This number will vary upwards and downwards with the local unemployment rate, unless such rate falls below 4.5 percent.</p> <p>Most current 12-month period data. July through June 12-month average.</p>	<p>Labor Market Information (LMI)</p>
	<p>3. 1/3 of available funds allocated on the basis of the relative number of disadvantaged adults in each workforce investment area, compared to the total number of disadvantaged adults in Ohio.</p>	<p>Disadvantaged adults = an individual who is age 22-72 who received an income or is a member of a family who received a total family income, that in relation to family size does not exceed the higher of the OMB poverty level or 70 percent of the Lower Living Standard Income Level.</p>	<p>Calculated based on decennial census data. As a result, these change only once every ten years and then remain constant until the census economic data become available from the next census.</p>	<p>2000 Census Data</p>

Subrecipient Allocation Methodology

(For Program Year 2010 Allotments)

FUNDING STREAM	FACTORS	DEFINITIONS	ASSIGNED WEIGHT %	HOW DETERMINED	DATA SOURCE	
Dislocated Worker WIA Federal Regulations Part 667.130 (Administrative Provisions)	Funding formulas for dislocated workers must use the most appropriate information available including information on insured unemployment data, unemployment concentrations, plant closings, mass layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data.					
	Assigned Weight Percentage Options Available (100% Split As Follows)					
	Weights					
	1. Insured unemployment	The relative number of unemployment insurance claimants under the UI system.	5	Most current 12-month period data. January through December 12-month average.	Labor Market Information (LMI)	
	2. Unemployment concentrations	The relative number of unemployed individuals residing in counties with an unemployment rate higher than the statewide unemployment rate for the same time periods as used in federal allotments.	20	Exception: Unemployment Concentrations: October through September.	Labor Market Information (LMI)	
	3. Plant closings/ Mass layoffs	The relative number of plants which are no longer in operation and/or the relative number of displaced individuals.	5	Most current 12-month period data. January through December 12-month average.	Labor Market Information (LMI)	
	4. Mass layoffs	Mass layoffs are those which affect 50 or more workers at a single site. This information is obtained from the WARN data (2001, 2002, and 2003 three-year average of displaced workers).	5	Most current 36-month period data. January through December 3-year average.	OWD WARN Notices (Rapid Response)	
	5. Declining industries	The relative number of jobs lost within industries which have experienced declining employment.	5	Most current 12-month period data. January through December 12-month average.	Labor Market Information (LMI)	
6. Farmer-rancher economic hardship (available by county only)	The relative decline in Ohio farm income as demonstrated by information obtained from the total cash receipts of farm sales. This decline represents economic hardship and financial suffering as a result of the declining agricultural industry.	5	Most current 12-month period data. January through December 12-month average.	Ohio Agricultural Statistics Service (USDA)		
7. Long-term unemployment	The relative number of unemployment insurance claimants who have received benefits for 15 weeks or more weeks under the UI system.	55	Most current 12-month period data. January through December 12-month average.	Labor Market Information (LMI)		

Attachment H

Governor's Executive Workforce Board

Member	Title	Company/Organization
John Kasich	Governor	State of Ohio
R. Blane Walter (Chair)	Founder/ CEO	InChord Communications
John E. Barnes, Jr.	Representative	Ohio House
Bill Beagle	Senator	Ohio Senate
Ralf Bronnenmeier	Chief Executive Officer	Grob Systems, Inc.
Roy A. Church	President	Lorain County Community College
Michael B. Colbert	Director	Ohio Department of Job and Family Services
Janet Creighton	County Commissioner	Stark County
Tim Derickson	Representative	Ohio House
Dennis Franks	Superintendent	Pickaway Ross Career and Technology Center
Lou Gentile	Senator	Ohio Senate
Vicki Giambrone	Mayor	City of Beavercreek
Mitchell P. Grindley	Vice President	Plaskolite, Inc.
Amanda Hoyt	Director of Public Affairs	Finance Fund
Julie S. Janson	President	Duke Energy
David L. Joyce	President/CEO	General Electric Aviation
John Komor	Plant Manager	General Mills
Dennis A. Nash	Director/CEO	Kenan Advantage Group (KAG)
Phillip L. Parker	President/CEO	Dayton Area Chamber of Commerce
Albert B. Ratner	Co-Chairman Emeritus	Forest City Enterprises, Inc.
Doug Reffitt	Director	Ohio Regional Council of Carpenters
Patrick Sink	Business Manager	International Union of Operating Engineers
Richard A. Stoff	President/CEO	Ohio Business Roundtable (OBR)
Gary S. Weinstein	Chief Operating Officer	Providence Equity Partners
David Whitehead	COO (Retired)	FirstEnergy
Thomas F. Zenty III	Chief Executive Officer	University Hospitals

Attachment J
Additional LMI Information

Figure 1: Top Occupations found in Area Job Ads

Total Ads	169,649
Truck Drivers, Heavy and Tractor-Trailer	7,540
Registered Nurses	6,548
Retail Salespersons	5,775
First-Line Supervisors/Managers of Retail Sales Workers	4,652
Customer Service Representatives	4,337
Computer Systems Analysts	3,163
1st-Line Superv/Mgr of Food Prep & Serving Workers	3,084
Sales Reps, Wholesale & Mfg, Exc Tech & Sci Prod	2,574
1st-Line Superv/Mgr of Prod & Oper Workers	2,402
Maintenance and Repair Workers, General	2,236
1st-Line Superv/Mgr of Office & Admin Support Workers	2,217
Computer Support Specialists	2,048
Medical and Health Services Managers	2,031
Web Developers	1,999
Executive Secretaries and Administrative Assistants	1,859
Sales Representatives, Services, All Other	1,786
Sales Agents, Financial Services	1,737
Sales Reps, Wholesale & Mfg, Tech & Sci Prod	1,707
Insurance Sales Agents	1,700
Marketing Managers	1,607
Sales Managers	1,551
General and Operations Managers	1,455
Accountants	1,444

Source: The Conference Board Help Wanted Online®

Figure 2: Long-Term Employment Forecast by Industry Sector, 2008-18

Industry	2008 Employment	2018 Projection	Net Change	Percent Change
Total, All Industries	5,726,100	5,975,100	249,000	4.3%
Goods-Producing Industries	1,054,600	964,600	-90,000	-8.5%
Agriculture, forestry, fishing and hunting	92,500	88,800	-3,700	-4.0%
Mining*	11,600	11,100	-500	-4.3%
Construction	211,500	235,700	24,200	11.4%
Manufacturing	739,000	629,100	-109,900	-14.9%
Service-Providing Industries	4,337,100	4,666,900	329,800	7.6%
Wholesale trade	236,500	240,900	4,400	1.9%
Retail trade	589,300	586,200	-3,100	-0.5%
Transportation and warehousing	188,100	206,000	17,900	9.5%
Utilities	21,700	19,400	-2,300	-10.6%
Information	86,100	80,100	-6,000	-7.0%
Finance and insurance	226,000	234,200	8,200	3.6%
Real estate and rental and leasing	63,500	67,100	3,600	5.7%
Professional and technical services	250,500	306,000	55,500	22.2%
Management of companies and enterprises	109,600	117,200	7,600	6.9%
Administrative and waste services	307,300	345,600	38,300	12.5%
Educational services	90,000	102,300	12,300	13.7%
Health care and social assistance	704,300	853,500	149,200	21.2%
Arts, entertainment and recreation	63,700	65,800	2,100	3.3%
Accommodation and food services	428,400	447,600	19,200	4.5%
Other services, except public administration	220,700	240,900	20,200	9.2%
Government	751,400	755,000	3,600	0.5%
Self-Employed, Private Household & Unpaid Family Workers	334,400	342,700	8,300	2.5%

*Projections on Mining do not include shale oil and gas advances.

Source: 2018 Ohio Job Outlook, ODJFS, Bureau of Labor Market Information, 2010.

Overall, total employment is expected to grow 4.3 percent from 2008 to 2018. For comparison, the Bureau of Labor Statistics (BLS) projected national employment growth of 10.6 percent over the same period. Ohio employment in goods-producing industries is expected to decline 8.5 percent over the ten-year period. Agriculture, forestry, fishing, and hunting is expected to decline 4.0 percent; mining is expected to decline 4.3 percent; and manufacturing will drop 14.9 percent. Construction is the only goods-producing sector expected to add jobs—11.4 percent over ten years.

Employment in service-providing industries is expected to grow 7.6 percent during the period of analysis. Three sectors are projected to lose jobs in net: retail trade (-0.5%), utilities (-10.6%), and information (-7.0%). Modest growth (less than 5%) is projected in several industries, including wholesale trade (1.9%), finance and insurance (3.6%), arts, entertainment, and recreation (3.3%), accommodation and food services (4.5%) and government (0.5%). The three sectors with the strongest projected growth are professional and technical services (22.2%); health care and social assistance (21.2%); and private educational services (13.7%).

Self-employed, private households and unpaid family workers are listed as growing by 2.5 percent. The self-employed are 90 percent of this group and none of the workers are included in the industries delineated in the rest of the table.

Figure 3. Industry Employment Projections by Metropolitan Statistical Area, 2008-2018

Metropolitan Statistical Area, Numeric and Percentage Change																
Description	Akron		Canton		Cincinnati		Cleveland		Columbus		Dayton		Toledo		Youngstown	
	Change	Percent	Change	Percent	Change	Percent	Change	Percent	Change	Percent	Change	Percent	Change	Percent	Change	Percent
TOTAL	15,300	4.33%	4,700	2.58%	54,800	4.99%	18,800	1.69%	57,300	5.83%	8,200	1.98%	4,000	1.20%	2,800	1.17%
Goods Producing	-4,800	-8.15%	-3,100	-7.67%	-6,900	-3.92%	-23,300	-12.82%	-7,900	-6.70%	-9,100	-13.75%	-7,800	-12.68%	-5,500	-11.80%
Natural Resources	-100	-5.00%	-100	-3.57%	-500	-4.20%	-300	-4.69%	-400	-4.26%	-200	-4.26%	-200	-4.55%	-400	-10.81%
Construction	500	3.97%	100	1.33%	3,300	7.25%	-900	-2.44%	1,000	2.94%	700	5.26%	-200	-1.55%	-600	-6.82%
Manufacturing	-5,200	-11.74%	-3,000	-9.97%	-9,600	-8.09%	-22,000	-15.90%	-8,500	-11.42%	-9,600	-19.96%	-7,300	-16.55%	-4,600	-13.45%
Service-Providing	19,500	7.14%	7,500	5.73%	60,000	7.00%	40,500	4.70%	63,800	7.91%	16,600	5.15%	11,300	4.47%	8,000	4.48%
Trade, Transportation & Utilities	1,300	1.97%	100	0.32%	3,800	1.84%	-2,200	-1.15%	4,100	2.20%	-1,300	-1.98%	400	0.63%	-200	-0.41%
Information	-100	-2.27%	-200	-9.52%	-1,100	-7.28%	-2,000	-11.36%	-1,800	-10.29%	800	6.72%	-300	-8.33%	0	0.00%
Financial Activities	1,000	6.85%	300	3.80%	2,000	3.31%	-800	-1.19%	1,700	2.45%	100	0.56%	300	2.50%	-100	-1.22%
Professional & Business Services	5,600	10.83%	1,300	9.15%	16,700	11.04%	14,400	10.37%	22,800	15.38%	3,500	7.13%	1,800	5.57%	1,200	6.12%
Education & Health Services	9,700	20.00%	5,000	16.78%	26,900	18.63%	27,800	16.05%	25,400	22.76%	11,100	17.21%	8,200	15.92%	7,400	17.62%
Leisure & Hospitality	600	1.97%	700	4.22%	6,200	5.89%	700	0.77%	6,700	7.59%	800	2.17%	300	0.93%	-600	-2.71%
Other Services	1,100	7.97%	300	3.57%	3,800	9.11%	2,700	6.26%	2,000	5.51%	800	5.23%	600	4.20%	200	2.04%
Government	100	0.23%	0	0.00%	1,600	1.20%	-200	-0.14%	2,900	1.95%	900	1.47%	-100	-0.23%	100	0.40%

Source: ODJFS, Bureau of Labor Market Information

Figure 4: Long-Term Employment Forecast by Major Occupational Group, 2008-18

Occupational Group	2008 Employment	2018 Projection	Net Change	Percent Change	Total Annual Openings
All Occupations	5,726,100	5,975,100	249,000	4.3%	166,269
Management Occupations	296,650	296,290	-360	-0.1%	6,453
Business and Financial Operations Occupations	240,990	266,370	25,380	10.5%	7,503
Computer and Mathematical Occupations	130,300	153,150	22,850	17.5%	4,764
Architecture and Engineering Occupations	91,550	93,670	2,120	2.3%	2,374
Life, Physical, and Social Science Occupations	41,150	45,300	4,150	10.1%	1,684
Community and Social Services Occupations	109,160	121,980	12,820	11.7%	3,629
Legal Occupations	37,460	39,250	1,790	4.8%	850
Education, Training, and Library Occupations	302,470	325,250	22,780	7.5%	9,138
Arts, Design, Entertainment, Sports, & Media Occ.	82,600	86,850	4,250	5.1%	2,632
Healthcare Practitioners and Technical Occupations	326,850	381,360	54,510	16.7%	12,217
Healthcare Support Occupations	201,960	257,080	55,120	27.3%	7,746
Protective Service Occupations	117,200	120,680	3,480	3.0%	3,795
Food Preparation and Serving Related Occupations	472,430	498,330	25,900	5.5%	18,537
Building & Grounds Cleaning & Maintenance Occup.	195,230	199,690	4,460	2.3%	3,856
Personal Care and Service Occupations	151,210	173,120	21,910	14.5%	5,872
Sales and Related Occupations	600,140	606,460	6,320	1.1%	18,807
Office and Administrative Support Occupations	892,470	916,530	24,060	2.7%	23,423
Farming, Fishing, and Forestry Occupations	15,530	14,920	-610	-3.9%	417
Construction and Extraction Occupations	216,510	229,410	12,900	6.0%	5,259
Installation, Maintenance, and Repair Occupations	224,670	225,210	540	0.2%	4,932
Production Occupations	540,890	485,180	-55,710	-10.3%	10,697
Transportation and Material Moving Occupations	438,660	439,030	370	0.1%	11,685

Source: 2018 Ohio Job Outlook, ODJFS, Bureau of Labor Market Information, 2010.

Figure 8 above shows the long-term employment projections by major occupational grouping for Ohio. Over the 2008-2018 period of analysis, three major occupational groups are projected to lose jobs in net: production (-10.3%); farming, fishing, and forestry (-3.9%); and management (-0.1%). Another twelve occupational groups are expected to show employment growth stronger than the statewide average of 4.3 percent: business and financial operations (10.5%); computer and mathematical (17.5%); life, physical, and social science (10.1%); community and social services (11.7%); legal (4.8%); education, training, and library (7.5%); arts, design, entertainment, sports, and media (5.1%); healthcare practitioners and technical (16.7%); healthcare support (27.3%, the strongest of all groups); food preparation and serving related (5.5%); personal care and service (14.5%); and construction and extraction (6.0%).

Figure 5: Projected Select Occupations by Educational Requirement, 2008-2018

Akron MSA

SOC	Occupational Title	Precited Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
41-2011	Cashiers	150	1.8%	388
41-2031	Retail Salespersons	320	3.1%	324
35-3031	Waiters and Waitresses	0	0.0%	318
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	850	14.6%	268
43-6013	Medical Secretaries	560	24.6%	87
43-3031	Bookkeeping, Accounting, and Auditing Clerks	250	5.3%	82
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
33-2011	Fire Fighters	130	10.2%	52
47-2111	Electricians	0	0.0%	45
35-2014	Cooks, Restaurant	20	1.3%	41
Occupations Requiring Work Experience in a Related Occupation				
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	140	2.7%	135
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	70	1.6%	103
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	200	6.6%	89
Occupations Requiring Postsecondary Vocational Training				
29-2061	Licensed Practical & Licensed Vocat. Nurses	430	18.5%	115
31-1012	Nursing Aides, Orderlies, and Attendants	740	18.3%	114
41-3021	Insurance Sales Agents	470	26.0%	89
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	1,340	18.0%	264
15-1041	Computer Support Specialists	90	6.7%	46
29-2021	Dental Hygienists	110	31.4%	18

Source: ODJFS, Bureau of Labor Market Information

Figure 6: Projected Select Occupations by Educational Requirement, 2008-2018

Canton MSA

SOC	Occupational Title	Precited Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
41-2011	Cashiers	-10	-0.2%	209
35-3021	Comb. Food Prep. & Serv. Work, inc. Fast Food	560	9.5%	181
35-3031	Waiters and Waitresses	50	1.6%	173
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	240	10.7%	95
51-2092	Team Assemblers	-210	-9.2%	52
43-6013	Medical Secretaries	280	22.4%	45
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
35-2014	Cooks, Restaurant	40	3.7%	32
33-2011	Fire Fighters	40	6.3%	24
47-2111	Electricians	-60	-6.5%	22
Occupations Requiring Work Experience in a Related Occupation				
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	30	1.6%	44
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	10	0.5%	43
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	80	6.3%	37
Occupations Requiring Postsecondary Vocational Training				
29-2061	Licensed Practical & Licensed Vocat. Nurses	220	12.7%	76
31-1012	Nursing Aides, Orderlies, and Attendants	320	11.4%	60
41-3021	Insurance Sales Agents	120	11.8%	36
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	420	11.2%	107
15-1041	Computer Support Specialists	30	5.9%	17
31-2021	Physical Therapist Assistants	110	33.3%	16

Source: ODJFS, Bureau of Labor Market Information

Figure 7: Projected Select Occupations by Educational Requirement, 2008-2018

Cincinnati MSA

SOC	Occupational Title	Projected Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
35-3031	Waiters and Waitresses	1,130	4.7%	1,435
41-2011	Cashiers	360	1.4%	1,205
35-3021	Comb. Food Prep. & Serv. Work, inc. Fast Food	3,090	12.6%	830
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	2,240	13.3%	754
43-3031	Bookkeeping, Accounting, and Auditing Clerks	860	5.9%	262
43-6013	Medical Secretaries	1,530	23.0%	243
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
35-2014	Cooks, Restaurant	480	6.5%	236
33-2011	Fire Fighters	450	11.2%	168
47-2111	Electricians	90	1.7%	134
Occupations Requiring Work Experience in a Related Occupation				
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	310	2.1%	370
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	580	5.5%	294
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	130	1.3%	229
Occupations Requiring Postsecondary Vocational Training				
31-1012	Nursing Aides, Orderlies, and Attendants	1,980	15.2%	328
29-2061	Licensed Practical & Licensed Vocat. Nurses	1,190	18.4%	321
39-5012	Hairdressers, Hairstylists and Cosmetologists	1,230	19.9%	214
Occupations Requiring an Associate Degree				
15-1041	Computer Support Specialists	280	5.5%	169
29-2021	Dental Hygienists	460	30.7%	77
15-1099	Computer Specialists, All Other	90	4.5%	53

Source: ODJFS, Bureau of Labor Market Information

Figure 8: Projected Select Occupations by Educational Requirement, 2008-2018

Cleveland MSA

SOC	Occupational Title	Projected Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
41-2011	Cashiers	240	1.0%	1,064
35-3031	Waiters and Waitresses	-270	-1.6%	908
41-2031	Retail Salespersons	-410	-1.4%	817
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	1,300	7.7%	664
51-2092	Team Assemblers	-770	-8.2%	212
43-3031	Bookkeeping, Accounting, and Auditing Clerks	250	1.6%	210
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
33-2011	Fire Fighters	490	9.6%	205
35-2014	Cooks, Restaurant	-40	-0.6%	173
33-3051	Police and Sheriff's Patrol Officers	20	0.3%	164
Occupations Requiring Work Experience in a Related Occupation				
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	-270	-1.9%	336
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	160	1.7%	234
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	20	0.2%	233
Occupations Requiring Postsecondary Vocational Training				
31-1012	Nursing Aides, Orderlies, and Attendants	2,570	15.7%	420
29-2061	Licensed Practical & Licensed Vocat. Nurses	1,170	13.9%	381
25-2011	Preschool Teachers, except Special Education	1,580	25.5%	282
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	4,080	14.8%	890
15-1041	Computer Support Specialists	290	8.2%	127
15-1099	Computer Specialists, All Other	140	5.9%	65

Source: ODJFS, Bureau of Labor Market Information

Figure 9: Projected Select Occupations by Educational Requirement, 2008-2018

Columbus MSA

SOC	Occupational Title	Precited Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
35-3031	Waiters and Waitresses	1,100	6.4%	1,062
41-2011	Cashiers	-180	-0.8%	1,014
35-3021	Comb. Food Prep. & Serv. Work, inc. Fast Food	3,920	14.9%	951
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	2,650	13.3%	893
43-3031	Bookkeeping, Accounting, and Auditing Clerks	680	5.2%	225
43-6013	Medical Secretaries	1,250	20.9%	206
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
35-2014	Cooks, Restaurant	560	8.1%	233
33-2011	Fire Fighters	420	11.8%	152
33-3051	Police and Sheriff's Patrol Officers	80	1.8%	123
Occupations Requiring Work Experience in a Related Occupation				
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	360	3.6%	266
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	500	5.4%	259
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	-150	-1.5%	211
Occupations Requiring Postsecondary Vocational Training				
29-2061	Licensed Practical & Licensed Vocat. Nurses	1,020	19.0%	270
31-1012	Nursing Aides, Orderlies, and Attendants	1,400	16.4%	225
41-3021	Insurance Sales Agents	620	12.2%	180
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	2,640	16.1%	550
15-1041	Computer Support Specialists	1,250	18.9%	308
15-1099	Computer Specialists, All Other	200	10.8%	60

Source: ODJFS, Bureau of Labor Market Information

Figure 10: Projected Select Occupations by Educational Requirement, 2008-2018

Dayton MSA

SOC	Occupational Title	Precited Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
41-2011	Cashiers	-220	-2.3%	430
35-3031	Waiters and Waitresses	-10	-0.1%	377
35-3021	Comb. Food Prep. & Serv. Work, inc. Fast Food	960	7.8%	355
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	500	8.0%	246
43-6013	Medical Secretaries	560	19.7%	94
51-2092	Team Assemblers	-330	-9.5%	78
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
35-2014	Cooks, Restaurant	30	1.2%	69
13-1023	Purchasing Aqents, ex. Whole., Retail, & Farm	150	9.1%	58
33-2011	Fire Fighters	150	10.8%	58
Occupations Requiring Work Experience in a Related Occupation				
41-1011	First-Line Superv./Mqrs of Retail Sales Workers	-20	-0.5%	95
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	-190	-4.8%	91
43-1011	First-Line Sup/Mqrs of Office & Admin. Support	60	1.8%	82
Occupations Requiring Postsecondary Vocational Training				
29-2061	Licensed Practical & Licensed Vocat. Nurses	360	12.9%	123
31-1012	Nursing Aides, Orderlies, and Attendants	550	9.0%	116
41-3021	Insurance Sales Agents	170	8.7%	63
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	1,720	17.2%	347
15-1041	Computer Support Specialists	310	13.8%	93
15-1099	Computer Specialists, All Other	70	6.4%	31

Source: ODJFS, Bureau of Labor Market Information

Figure 11: Projected Select Occupations by Educational Requirement, 2008-2018

Toledo MSA

SOC	Occupational Title	Precited Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
41-2011	Cashiers	0	0.0%	420
35-3031	Waiters and Waitresses	-90	-1.4%	344
41-2031	Retail Salespersons	410	4.2%	271
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	310	8.1%	121
51-2092	Team Assemblers	-530	-15.8%	76
49-9042	Maintenance and Repair Workers, General	-20	-0.5%	58
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
35-2014	Cooks, Restaurant	0	0.0%	42
33-3051	Police and Sheriff's Patrol Officers	-10	-0.7%	36
47-2031	Carpenters	-110	-4.2%	33
Occupations Requiring Work Experience in a Related Occupation				
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	100	2.8%	86
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	-10	-0.3%	83
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	60	2.2%	68
Occupations Requiring Postsecondary Vocational Training				
31-1012	Nursing Aides, Orderlies, and Attendants	670	14.8%	112
29-2061	Licensed Practical & Licensed Vocat. Nurses	350	15.4%	106
41-3021	Insurance Sales Agents	230	15.0%	59
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	1,320	14.7%	289
15-1041	Computer Support Specialists	20	2.3%	26
29-2021	Dental Hygienists	110	20.0%	22

Source: ODJFS, Bureau of Labor Market Information

Figure 12: Projected Select Occupations by Educational Requirement, 2008-2018

Youngstown MSA

SOC	Occupational Title	Precited Change in Employment		Total Annual Openings
		2008 - 2018	Percent	
Occupations Requiring Short-Term On-the-Job Training (up to one month)				
41-2011	Cashiers	-40	-0.6%	308
41-2031	Retail Salespersons	120	1.4%	256
35-3031	Waiters and Waitresses	-180	-4.1%	242
Occupations Requiring Moderate-Term On-the-Job Training (1-12 months combined experience/training)				
43-4051	Customer Service Representatives	190	7.9%	94
43-6013	Medical Secretaries	420	17.7%	74
51-2092	Team Assemblers	-80	-3.7%	49
Occupations Requiring Long-Term On-the-Job Training (12 months or more combined experience/training)				
35-2014	Cooks, Restaurant	-40	-2.6%	39
47-2111	Electricians	-100	-8.5%	28
33-2011	Fire Fighters	70	11.1%	27
Occupations Requiring Work Experience in a Related Occupation				
41-1011	First-Line Superv./Mgrs of Retail Sales Workers	30	1.0%	69
41-4012	Sales Rep., Wholesale/Mfg, ex. Tech./Sci. Prod.	-70	-2.8%	57
43-1011	First-Line Sup/Mgrs of Office & Admin. Support	70	3.9%	47
Occupations Requiring Postsecondary Vocational Training				
29-2061	Licensed Practical & Licensed Vocat. Nurses	450	17.1%	127
31-1012	Nursing Aides, Orderlies, and Attendants	650	15.6%	107
25-2011	Preschool Teachers, except Special Education	310	32.0%	50
Occupations Requiring an Associate Degree				
29-1111	Registered Nurses	690	13.4%	159
15-1041	Computer Support Specialists	40	6.3%	22
29-2021	Dental Hygienists	110	23.4%	21

Source: ODJFS, Bureau of Labor Market Information

Figure 13: Educational Attainment by Age Group

Educational Attainment	Age Group				
	18-24	25-34	35-44	45-64	65 and older
Less than 9th grade	1.5%	2.3%	2.1%	2.2%	7.5%
9th to 12th grade, no diploma	14.2%	7.4%	6.3%	7.3%	13.0%
High school graduate, GED, or alternative	30.5%	26.2%	29.8%	36.9%	42.4%
Some college, no degree	41.8%	25.5%	23.1%	20.8%	16.1%
Associate's degree	3.6%	9.2%	9.6%	8.5%	3.6%
Bachelor's degree	7.9%	20.4%	18.4%	14.7%	10.0%
Graduate or professional degree	0.5%	9.1%	10.6%	9.5%	7.5%

Source: American Community survey, 2011

Figure 14: Educational Attainment by Race/Ethnic Group

Educational Attainment Ages 25 and older	Race/Ethnic Group		
	White	Black/African- American	Hispanic- Latino
Less than 9th grade	2.9%	3.4%	14.7%
9th to 12th grade, no diploma	7.7%	14.1%	12.8%
High school graduate, GED, or alternative	36.0%	32.7%	29.2%
Some college, no degree	20.3%	27.3%	19.2%
Associate's degree	7.7%	7.8%	7.1%
Bachelor's degree	16.2%	9.5%	10.7%
Graduate or professional degree	9.2%	5.1%	6.3%

Source: American Community Survey, 2011

Figure 15: Language Spoken in the Home and Educational Attainment of Those Not in the Labor Force

Educational Attainment Ages 25 and Older	Language Spoken in the Home				
	English	Spanish	Other Indo- European	Asian- Pacific Island	Other languages
Less than high school graduate	20.7%	40.6%	34.8%	18.7%	30.6%
High school graduate, GED	42.0%	24.5%	24.1%	16.1%	23.3%
Some college or Associate degree	22.7%	21.0%	17.9%	16.9%	22.5%
Bachelor's degree or higher	14.7%	13.8%	23.1%	48.3%	23.6%

Source: American Community Survey, 2011

Speaking a language other than English in the home and having lower levels of educational attainment are associated with an increased likelihood of not being in the labor force, except among those speaking Asian or Pacific Island languages in the home.

Figure 16: Educational Attainment and Disability Status

School Enrollment or Educational Attainment, Ages 18 to 34	Persons with Disabilities	Persons without Disabilities
Enrolled in school, below college	7.6%	4.3%
Enrolled in college or graduate school	15.0%	26.3%
Less than high school graduate	21.7%	8.0%
High school graduate, GED	37.4%	26.2%
Some college or associate's degree	14.1%	18.9%
Bachelor's degree or higher	4.2%	16.3%