

**Ohio's Combined State Plan**  
**Revisions Made as a Result of Final Federal Guidance**  
**Section II., Strategic Elements and Section III., Operational Planning Elements**

**Section II. Strategic Elements**

(a) Economic, Workforce, and Workforce Development Activities Analysis.

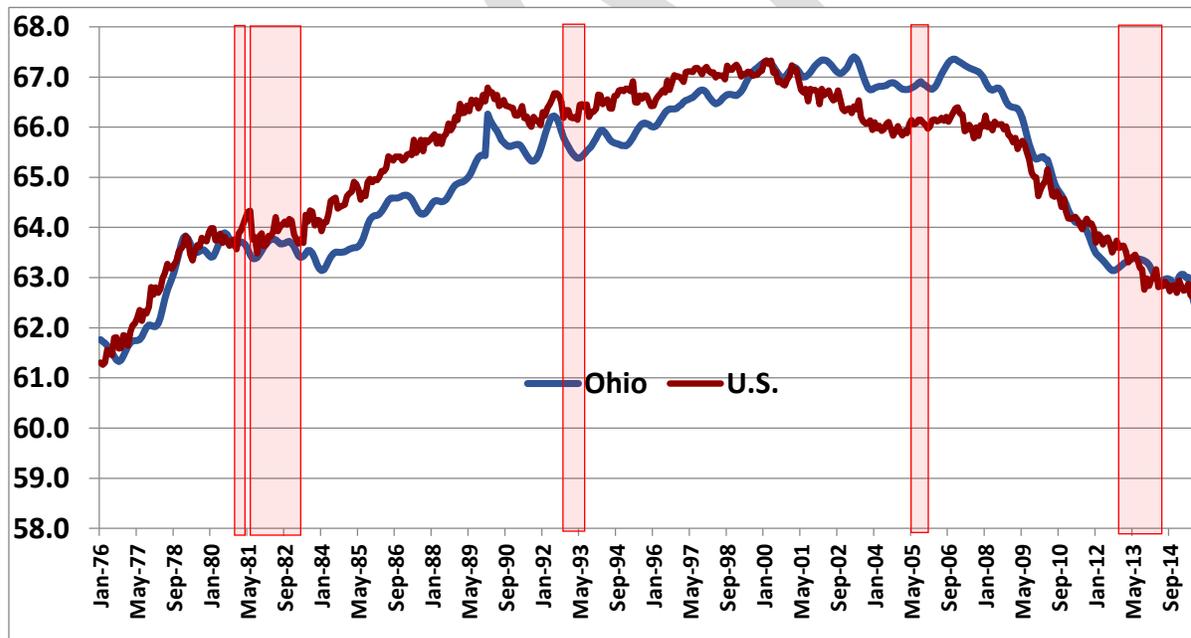
(B) Workforce Analysis

(i) Employment and Unemployment. Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

The following language will be added:

Figure 6 shows the U.S. and Ohio labor force participation rates from January 1976 through July 2015. Ohio's labor force participation rate trailed the U.S. for much of this period and peaked after the U.S. in 2003, but Ohio has experienced the same drop in labor force participation. Prior to the recession, Ohio's seasonally adjusted labor force participation rate reached a high of 67.4 percent in 2003 and declined to 62.6 percent in July 2015.

Figure 6. Ohio and U.S. Labor Force Participation Rates, Seasonally Adjusted



(similar, but expanded language is required in final guidance)

(c) State Strategy.

(1) Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career

pathways, as required by WIOA section 101(d)(3)(B), (D). “Career pathway” is defined at WIOA section 3(7). “In-demand industry sector or occupation” is defined at WIOA section 3(23).

Below are the strategies that ODJFS/OWD are currently engaged in:

**Develop Regional Approaches to Key Industry Sectors.** ODJFS-OWD will assist in convening leadership teams comprised of business representatives, trade organizations, Workforce Development Boards, educational institutions, and other key stakeholders from across the participating regions and WDB Areas for each of the key industry sectors. These teams are identifying the primary skills and related credentials that are required for the industry’s in-demand and emerging occupations. Many of the career pathways and related curricula, from entry to high-level jobs, have been developed by the Ohio Department of Education (ODE) and Ohio Department of Higher Education and exist within the OhioMeansJobs website. These teams will be able to use tools within the OhioMeansJobs website to analyze, right-size and enhance these pathways and explore the possibility of stackable credentials.

**Identify Promising Practices.** ODJFS-OWD is tracking the results of the various training programs for each of the key industry sectors. The approaches and models that have a high-level of success will be shared as best practices for other regions throughout the state to use and replicate. Any potential best practices will be shared and incorporated into the OhioMeansJobs website so all areas in Ohio can benefit.

**Share Resources Related to Enhanced Career Services.** ODJFS-OWD will work with local Boards to coordinate the sharing of resources related to enhanced career services. It is planned that at a minimum such items will include procurements for supplies and comprehensive assessments, as well as workshop and training curricula.

**Conduct Asset Mapping.** ODJFS-OWD is assisting the Workforce Development Boards and educational institutions in identifying consistent methods, approaches, and tools to be used on a regional, and ultimately a statewide basis, for assessing and training individuals for key in-demand occupations. Such approaches may include specific assessment tools and/or standard curricula for work-based training activities for particular occupations.

### **III. Operational Planning Elements**

(a) State Strategy Implementation.

(2) Implementation of State Strategy.

(D) *Coordination, Alignment and Provision of Services to Employers.* Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs **and to achieve the goals of industry or sector partners in the state.** The activities described shall conform to the statutory requirements of each program.

As mentioned in Section II(c)(1), ODJFS and OWT awarded grants to six industry and sector partnerships for the Industry Workforce Alliances (IWA) initiative to develop and implement strategies for an employer-driven career pathway system. IWA projects involve collaboration among local workforce development boards, employers, and education/training providers to combine short-term training and paid work experience that provides participants with the skills needed to meet employers' needs. The six local alliances participating in a pilot, launched in 2014, include:

- Mahoning Valley Manufacturing Coalition;
- Allen County Economic Development Group;
- Montgomery County Department of Community and Economic Development;
- Partners for a Competitive Workforce;
- Insurance Industry Resource Council; and
- Appalachian Ohio Health Professions Pathways.

The wage pathway model that will be piloted under the Workforce Innovation Fund grant, which was also mentioned in Section II(c)(1), will be a collaborative effort among ODJFS, local workforce development boards, local WIOA partners, the Ohio Department of Higher Education, and OOD to implement a skills-based approach that will place low-income, low-skilled youth into positions with employers that have positions in occupations that are in-demand. Participating employers and industry/sector partners will identify the skills rather than the credentials needed for in-demand jobs. Local area case managers will assess the skills of eligible participants and use the skills mapping tools in OhioMeansJobs.com to match participants' skills with jobs that will put participants on a wage pathway to an in-demand occupation. This alternative approach will allow participants to earn a sustainable wage while addressing barriers and will serve as a means to build new and build upon existing industry and sector partnerships.

ODJFS and OWT are also collaborating on a new initiative, Placement Strategies, as part of efforts to identify new, inventive, and more expedient strategies to serve unemployed workers through partnerships with employers and/or industry representatives. Placement Strategies involve job-specific assessments developed with employer input, use of the tools in OhioMeansJobs.com to assess job-readiness, categorizing workers into different levels of job-readiness, identifying any barriers to employment, and coordinating with OhioMeansJobs Centers, local WIOA partners, and other agencies to develop customized service delivery plans for rigorous job-readiness activities that will result in the placement of participants into in-demand jobs.

*(entirely new section)*

***(F) Partner Engagement with Other Education and Training Providers.***

**Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training**

provider list, as partners in the workforce development system to create a job-driven education and training system.

As stated in other sections, Ohio included Perkins Act programs in the Unified State Plan developed in 2014 and is including these programs in this Combined State Plan as well. Secondary and postsecondary educational providers are mandatory partners and will be engaged to strengthen Ohio's talent resource pool.

#### (b) State Operating Systems and Policies

*(all new language after first sentence)*

(2) The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, describe the State's process for developing guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system, including benchmarks, and its guidance to assist local boards, chief elected officials, and local one-stop partners in determining equitable and stable methods of funding infrastructure in accordance with sec. 121(h)(1)(B). Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, the State must also include such guidelines.

Ohio has been proactive and has convened meetings with the core partners and the local workforce development board directors to create a draft policy to address infrastructure funding processes and procedures, should it need to be implemented. This policy was recently distributed to all partners and put out for public comment, in addition to being presented at Ohio's WIOA training event held in October 2015. Comments are being reviewed in anticipation of a final policy in place that will be effective 1/1/17. Since Ohio has had successfully negotiated MOUs in the local areas based on fair share methodologies agreed upon by the partners since the inception of WIA, the policy provides guidelines for a formula based on previously negotiated MOUs in those local areas that cannot negotiate successfully. The policy applies a cap for partner contributions for infrastructure costs based on the WIOA requirements but also allows for annual increases (supported by documentation) that maintain the cap levels. The policy allows for local negotiation for non-infrastructure costs such as personnel and shared services above the required infrastructure caps. The final policy will be posted at: [http://jfs.ohio.gov/owd/WorkforceProf/policy\\_info.stm](http://jfs.ohio.gov/owd/WorkforceProf/policy_info.stm).

#### (4) Assessment and Evaluation of Programs and One-Stop Program Partners

*(last sentence is new)*

(A) Assessment of Core Programs. Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

The above elements set the stage for including local and regional planning goals in any state assessments. Though we are held to state negotiated performance standards by DOL, the state promotes local and regional flexibility through:

1. Maintaining data systems to readily and periodically share pertinent information with local and regional entities to inform their planning.
2. Providing local and regional flexibility, within the context of state performance goals, for planning and performance negotiation with the state.
3. Providing periodic reports at a local and regional level on their preliminary performance trends and status.
4. Conducting local and regional assessments within this context, particularly with consideration of economic data and other empirical analysis likely to impact program outcomes.
5. Considering any assessment analysis in future negotiation of local and regional performance goals and continuing improvement efforts.
6. Reporting to and oversight of the state and local workforce boards.

*(last sentence is new)*

(B) Assessment of One-Stop Program Partner Programs. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. **Such state assessments should take into account local and regional planning goals.**

Assuring state assessments, for One-Stop Program Partner Programs, consider local and regional planning goals follow the same principles and practices as with core programs. The major difference is that there are additional levels of coordination and communication around planning and goal setting. This involves recognition and coordination between:

1. State level partner programs.
2. One-Stops and local partner programs.
3. Local entities and procured service providers.

Additionally, there are different levels of authority in executing program objectives. The role of state program partners and state board oversight is to provide policy, guidance and technical assistance in assuring successful coordination and communication. With this, information will be available to provide state assessments that take into account local and regional planning goals in the same manner as with core programs.

*(entirely new section)*

(D) Evaluation. Describe how the state will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Evaluation and research projects on activities under the WIOA core programs first requires access to relevant data. Ohio has a considerable history in supporting State, Federal and external research and program evaluations through access to relevant data streams by way of information sharing agreements. Ohio has every intention of maintaining this approach. This capability has been enhanced through the Workforce Data Quality Initiative (WDQI) grant and the creation of the Ohio Longitudinal Data Archive (OLDA). This is a historical, cross-agency archive of administrative program data, with the specific objective of supporting policy analysis, research and program transparency (dashboards).

The WDQI has also led to coordination among state agencies in established priority research interests, as well as conducting specific research projects. This has included the OWD, JFS, Ed, HE, and OOD. This can easily be extended under the WIOA umbrella by incorporating input and guidance from the Core State Programs, the Governor's Office of Workforce Transformation, the State Workforce Board and representatives from local and regional areas, particularly the Workforce Development Board of Directors.

Ohio will ready share research and evaluation pertinent to WIOA with Federal Departments of Labor and Education. Ohio will also coordinate with Federal research interest, whether specific to grant require program evaluation studies or more broadly envisioned analysis or policy research.

*(entirely new section)*

**(9) Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners.** Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

OhioMeansJobs Centers provide bi-lingual staff, signage, documents and interpretation services for non-English speakers and English language learners.

## **V. Common Assurances**

*(entirely new section)*

**6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);**

Ohio has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3).

*(entirely new section)*

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

Ohio established state policy in accordance with 38 USC 4215 through WIOAPL No. 15-20 to ensure priority of service for veterans and eligible spouses in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

**Combined State Plan  
Revisions Resulting from Final Federal Guidance  
Title I-B and Title III**

**VI. Program-Specific Requirements for Core Programs.**

**Adult, Dislocated Worker, and Youth Activities under Title I-B.**

**(b) Adult and Dislocated Worker Program Requirements**

*(entirely new section)*

(4) Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) No. 15-08, Career Services for Adults and Dislocated Workers, and WIOAPL No. 15-09, Training Services for Adults and Dislocated Workers, state that priority of career services and training services funded by and provided through the adult program shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of those career and training services determined appropriate to obtain or retain employment. These policies emphasize that the requirement to prioritize individualized career and training services to those individuals who have the most barriers to employment and to provide those individuals with the opportunity to benefit from employment and training services.

WIOA policy letters are used to state requirements and to provide guidance to the local workforce development areas in the implementation of WIOA. The Office of Workforce Development provides the technical assistance to the local areas to assist in the implementation of the requirement to prioritize individualized career services and training services to those adults who are low-income, on public assistance, including development of local workforce area policies. This provision of the law will also be part of the annual WIOA programmatic monitoring, which includes interviews with staff and review of participant files, for adherence to federal law, regulations, and state and local policies.

*(entirely new section)*

(5) Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

A transfer policy has been drafted and is in the public comment process that will permit local areas to transfer adult funding to the dislocated worker program and *vice versa*. Areas will be permitted to transfer up to 50 percent of each funding stream without constraint, and will be able to ask permission from the state workforce agency to raise their transfer limit up to either 75 percent or 100 percent of adult or dislocated worker funding in a fiscal year. The purpose of this provision is for the state workforce agency to ensure the area has sufficient resources remaining available to be able to meet potential demand, such as if the area wishes to transfer dislocated worker funds to adult when a potential layoff event may be approaching.

(c) Youth Program Requirements

*(entirely new section)*

(2) Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

CCMEP ends the siloed, fragmented approach that has tried to treat the collected "symptoms" of poverty instead of seeking a cure for the underlying challenges that needy Ohioans face. Ohio's teens and young adults, ages 16-24, face higher rates of unemployment than any other age group and many teens struggle to complete high school. Many of these youth also encounter additional barriers to reaching their full potential including homelessness, substance abuse, teen pregnancy, and mental health issues. Addressing these issues and barriers early on in a coordinated way, could break the cycle of poverty.

Most of the CCMEP population will be out-of-school youth. By connecting clients to the right resources and services across various programs and partners, including adult and family literacy, Carl Perkins Career Tech, and local community-based organizations, standardizing eligibility, and combining resources to improve education and training outcomes, the participants will establish pathways to employment and begin to move up and out of poverty. This program integrates the funding from two existing programs, TANF and WIOA, to focus on each individual's unique needs and to make better use of these existing funds which are already allocated for purposes of employment and training and reaching self-sufficiency.

*(new phrases)*

(4) Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring

additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII).

For both the in-school and out-of-school youth programs, an individual who requires additional assistance to complete an education program or to secure or hold employment is one who receives or has received in the past six months, assistance from the supplemental nutrition assistance program (SNAP), temporary assistance to needy families (TANF), or supplemental security income (SSI) or other criteria defined by the local area's workforce development board.

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**Ohio's Combined State Plan**  
**Revisions made as a result of DOL's letter regarding Local Area Designation**

**Section IV. Program Specific Requirements for Core Programs**  
**Adult, Dislocated Worker and Youth Activities under Title I-B.**

**(a) General Requirements**

**(1) *Regions and Local Workforce Development Areas.***

**(A) Identify the regions and the local workforce development areas designated in the State.**

The local workforce development area designation process implemented under WIOA is currently on hold as one local workforce development area's request for designation was denied by the state. The local workforce development area appealed to the United States Department of Labor (USDOL). ~~The state and the local workforce development area are currently awaiting the decision of USDOL as to whether the local area should be designated as it has requested. In the meantime, the remaining designation requests are currently~~ **were put** on hold.

As the designation process is currently on hold, Ohio is continuing to adhere to the local area designation under WIA. The following are the current workforce development areas:

Area 1: Adams, Brown, Pike, and Scioto Counties

Area 2: Medina and Summit Counties

Area 3: Cuyahoga County

Area 4: Lorain County

Area 5: Lake County

Area 6: Stark and Tuscarawas Counties

Area 7: Allen, Ashland, Champaign, Clark, Clinton, Coshocton, Darke, Defiance, Delaware, Erie, Fayette, Fulton, Gallia, Greene, Guernsey, Hancock, Henry, Highland, Holmes, Huron, Knox, Jackson, Lawrence, Licking, Logan, Madison, Marion, Miami, Montgomery, Morrow, Muskingum, Ottawa, Paulding, Preble, Putnam, Sandusky, Seneca, Shelby, Union, Wayne, Williams, Wood, and Wyandot Counties

Area 8: Auglaize, Hardin, Mercer, and Van Wert Counties

Area 9: Lucas County

Area 10: Crawford and Richland Counties

Area 11: Franklin County

Area 12: Butler, Clermont, and Warren Counties

- Area 13: Hamilton County
- Area 14: Athens, Meigs, and Perry Counties
- Area 15: Monroe, Morgan, Noble, and Washington Counties
- Area 16: Belmont, Carroll, and Jefferson Counties
- Area 17: Columbiana and Mahoning Counties
- Area 18: Trumbull County
- Area 19: Ashtabula, Geauga, and Portage Counties
- Area 20: Fairfield, Hocking, Pickaway, Ross, and Vinton Counties

On February 24, 2016, the State received the designation appeal decision of USDOL. With this decision, Ohio will move forward with the designation process and will have all local workforce development areas designated before June 30, 2016.

At this time, the following local workforce development areas have been assigned to planning regions. As the local workforce development area designation process is ongoing, the assignment to a planning region is preliminary. Due to the geographic structure of some local workforce development areas, not all local areas are assigned to a planning region.

- Northeast Ohio Region: Areas 2, 3, 4, 5, and 19
- East Ohio Region: Areas 6, 17, and 18
- Southeast Ohio Region: Areas 14, 15, and 16
- Central Ohio Region: Areas 11 and 20
- Southwest Ohio Region: Areas 12 and 13

It should be noted that as the local workforce development area designation process is ongoing, the assignment to a planning region is preliminary. Once the local area designation process is complete, planning regions will be re-evaluated to determine if adjustments need to be made based on the newly designated local workforce development area geographic structure. This process will be completed before June 30, 2016.

**(B) Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.**

In fall 2014, Ohio began the process of informing local workforce development boards and local elected officials of the requirements pertaining to designation of local areas under WIOA. Using annual performance measure data from program year PY 2012 and PY 2013, Ohio communicated to the local areas whether or not their local area could apply for initial designation (by meeting or exceeding performance measures and maintaining fiscal integrity for PY 2012 and PY 2013) or for designation using the WIOA required criteria. Information was provided to local elected officials and local workforce development boards stating there was a desire for each county to review the criteria established under WIOA law and consider a change regardless of whether or not that local area met the criteria for initial designation.

In winter 2015, Ohio provided written communication and guidance to local elected officials regarding their responsibility to request designation of the local workforce development area. This communication was followed with a webinar to further explain the use of labor market, economic development, and fiscal information to assist in making the decision of how individual counties may partner. The state also held numerous speaking engagements at local workforce development board meetings and county commissioner meetings. Speaking engagements were also held with several partner agencies.

A state policy was published (WIOAPL 15-01), which outlines the process of determining local workforce development area designation, including the criteria for a local workforce development area and the procedure to apply for local area designation.

Ohio used the following criteria to assign local workforce development areas to a planning region:

- Single labor market;
- Common economic development area;
- Possession of the federal and non-federal resources to administer workforce development activities;
- Commuting patterns;
- Population centers;
- Labor force conditions;
- Industrial composition; and
- Geographic boundaries (including the requirement that a local workforce development area shall not be split into separate planning regions).

~~Due to the geographic structure of some local workforce development areas, not all local areas were assigned to a planning region.~~

Consultation with local elected officials and the workforce development boards began with meetings regarding local workforce development area designation. Written communication was provided to the local elected officials and local boards encouraging these entities to provide feedback on the planning regions.

Ohio had always planned to identify the planning regions at the conclusion of the local workforce development area designation process. However, as this process was placed on hold pending the appeal, Ohio made the decision to move ahead with the identification of planning regions so the full implementation of WIOA and its requirements would not be delayed. Therefore, the assignment of planning regions is preliminary until the local workforce development area designation process is complete. At that time, planning regions will be re-evaluated.

A state policy is being drafted, which will inform Ohio's workforce system of the identified planning regions as well as the requirements for local and regional planning.

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