



Policy Committee Minutes (special meeting) 11 December 2008

Policy P7-502: Individual Training Accounts (ITA)

The purpose for revising the policy is to prevent findings for our counties and tightening the guidelines.

There was discussion about preparedness tests for students considering online classes. Clark State uses one called "READI". This type of test is not required for traditional classes. It should be left as an option to the case manager to use; there may be other resources available through SCOTI.

Regarding the sections of the ITA policy:

Background

Cites for Ohio Ethics Law and Ohio Administrative Code for the use of WIA funds were added.

Customer Eligibility

"The only exception to this rule is if the participant can provide evidence to document **both** of the following:

- ◆ Permanent residence is not the parents' home, **and**
- ◆ More than 50% of the participant's monthly support comes from his or her own income"

This means that although a child may be a dependent based on the State's current definition, that child could still be eligible for an ITA based on their own income ("family of 1"). This pertains to a child (student) ages 18-23. The word "child" establishes a family relationship.

Does this revision state there are no exceptions to the policy? And if so, is there a way through the EEO process to address complaints?

- ◆ Michelle believes future uses of the current "dependent child" definition will result in a finding so complaints will be an issue. The state has indicated they will model its policy after the Area 7 policy. If complaints are made, this policy will be our documentation.

If a non-resident of Area 7 establishes an ITA, the Area 7 case manager needs to find out what the ITA limit is for the person's county of residence. The Policy Committee discussed establishing a reference tool for case managers to use rather than having to call the home county each time.

An unemployed participant does not have to meet the self-sufficiency test. The Self-Sufficiency policy speaks only to **employed** dislocated works and **employed** adults.

Customer Suitability

The word "**actively**" has been bolded under "Traditional College Student". The goal of ITAs is employment, not education. If a student has less than 24 months left in a four year degree, an ITA

might be appropriate. Students already enrolled will need to document their change in circumstance (i.e. losing a loan or scholarship) which creates a need for funding. For participants already with degree, the one year limit for skills upgrade was taken from another area's policy.

Course of Study

Cost of online classes versus on-campus classes should be considered, coupled with the participant's schedule (i.e. "do they need to arrange their schedule around work?"). It might be best to leave this to sub-grantee to decide and simply state that Area 7 is "supportive of online training".

Grades and Attendance

This is the same wording used in the Needs Related Payments (NRP) Policy. There was discussion about probationary periods to improve GPAs, or to go from fail to pass; also what length of probation time should be allowed.

The Area 7 Supportive Services Policy allows for a retake of a test; it is extended here to retake a course one time if it is failed. The case manager would make the decision on whether the student has prepared herself enough to succeed the second time.

Attendance

Some statement about attendance is recommended. One county compares mileage reimbursement based on the attendance sheet. Typically if a student has good attendance they will pass the certification test.

Training providers

◆ **Faith based**

Under WIA, a participant has a choice and an ITA can fund a religious school as long as the ITA requirements are met. This would restrict counties from NOT funding religious classes. This is not an Area 7 requirement; however, it is clarification of existing law.

◆ **Online schools**

This is similar to online classes and we will reword this section based on earlier comments. Do employers care if an applicant's credentials were earned online? If they have the skills, does it matter if the degree says, "online"?

◆ **Out-of-State schools**

Ohio schools should be used before out-of-state schools. In- state schools are usually cheaper, although sometimes out-of-state may actually be closer for the student. This should be an "encouragement" rather than "mandate".

◆ **Public & private schools**

Montgomery County only pays the amount that a public school charges even if the participant chooses to go to a more expensive school. The student has to document how they can pay the difference. This allows choice but limits payments. If the customer doesn't have a choice, like if the public school is wait-listed, the full amount of the private school should be paid.

Amount and duration

This was kept at \$15,000 for 24 months, for each Area 7 resident, with no cap on supportive services; this is left up to sub-grantee. Supportive services are in addition to \$15,000. Added wording **strongly** encourages counties to have system-wide policies for their local ITA cap. If a participant wants an additional ITA, there is a three year waiting period.

Funding and payment

There is a debate about if you say you will pay for two years (obligate to a participant), you need to be able to do that. However, sometimes funding is cut or something else prohibits the funding. Most counties use forms that students sign saying they realize this may happen.

Ethics and Conflict of Interest

It was suggested that if there is an agency connection to the participant, a sister county should approve it. Maybe this policy should be reassessed after a year to review the numbers and if it is working.

- ◆ Are there any good ideas for inter-county agreements? That seems to be the safest way to avoid perceived conflict of interest.
- ◆ Does the home county reimburse the sister county? Or does it come from each county's allocation? The managing county should pay for it if they choose to accept the referral, in order to avoid appearance of conflict.
- ◆ Martee Rogers asked if it could work like a confidential case load for a supervisor within the county if it was a relative, like is done in Public Assistance. The consensus was, "no"; related customers should be referred to neighboring counties. With PA, we don't have the choice to refer customers outside of the county. Also, the guidelines for eligibility are set with PA. With WIA, eligibility and suitability is very subjective. This is all the more reason to avoid an appearance of conflict by referring related customers out-of-county. If this poses a hardship to the customer, accommodations could be made to have staff from the other county come to the participant.

UPDATE: Public comment is favorable to maintaining a confidential case load; however, several surveyed counties showed mixed results. Some do not serve relatives at all regardless of appropriateness, some refer relatives out of county, some have a confidential case load, and some have an unrelated supervisor (out of the conflicted party's chain of command) manage the case. The state is strongly discouraging the "confidential case load" method and is considering mandating the "refer-out" method. More discussion to come.

- ◆ This draft will go out for public comments.

The next regular meeting is scheduled for February 4, 2009.