



Ohio Department of Job and Family Services

Office of Workforce Development

Public Interest Audit

February 2023

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To the Governor's Office, General Assembly, Director of the Ohio Department of Job and Family Services, Ohio Taxpayers, and Interested Citizens:

In 2021, the Ohio Auditor of State released three audits of ODJFS, two of which were conducted in response to concerns regarding the administration of the State's unemployment compensation program and how the unprecedented number of unemployment claims resulting from the COVID-19 pandemic were processed. These audits raised further questions related to ODJFS and workforce development efforts, which led to this audit.

This audit report contains recommendations, supported by detailed analysis, to enhance the overall efficiency, effectiveness, and transparency of workforce development throughout Ohio. Particular attention was paid to ensuring that programs and services are offered at the local level and all Ohioans are able to access these services while trying to build job skills and obtain employment.

It is my hope that the Department and local partners will use the results of the performance audit as a resource for improving operational efficiency as well as service delivery effectiveness. The analysis contained within are intended to provide management with information, and in some cases, a range of options to consider while making decisions about their operations.

This performance audit report can be accessed online through the Auditor of State's website at http://www.ohioauditor.gov and choosing the "Search" option.

Sincerely,

Keith Faber Auditor of State Columbus, Ohio



Ohio Department of Job and Family Services

Public Interest Audit Summary

What We Looked At

The Ohio Department of Job and Family Services (ODJFS) is responsible for the administration of programs that provide billions of dollars in services and aid to Ohioans on an annual basis. These services include cash and food assistance programs, child and adult protective services, unemployment benefits, and workforce development programs.

In 2021, the Ohio Auditor of State released three audits of ODJFS, two of which were conducted in response to concerns regarding the administration of the State's unemployment compensation program and how the unprecedented number of unemployment claims resulting from the COVID-19 pandemic were processed. During the course of these audits, further questions were raised regarding the effectiveness of programs designed to assist individuals attempting to reenter the workforce.

As the job market has attempted to recover from the pandemic job losses, Ohio employers have struggled to find well-qualified workers to fill open positions. This audit in the public interest was initiated to review the Department's Office of Workforce Development and associated programs to identify opportunities for improved efficiency, effectiveness, and transparency. This review included an examination of area operations including the services offered at the state's One-Stop centers, which provide employment services to both job seekers and employers. We additionally reviewed the success of OhioMeansJobs.com, the state's on-line job board, as it relates to effectively helping Ohioans obtain meaningful employment, unemployment benefits work search activities, and cyber security practices related to unemployment insurance (UI).

What We Found

The federal government, through the Workforce Innovation and Opportunity Act (WIOA), provides funding to states for workforce development purposes. This federal program requires that specific performance related data to be collected and reported. The information is used to track the effectiveness of workforce development programming. We found that ODJFS and the Local Areas are collecting this information and reporting it as required by federal law. However, we also determined that there is additional information that could be tracked and utilized by the Department to improve overall program delivery and strategic planning.

In particular, ODJFS does not centrally track the programs, partners, or services located at individual workforce development centers. This makes it difficult to compare how accessible programs are for individuals across the state. Since those seeking assistance may face additional financial and transportation barriers, it is important to evaluate whether all Ohioans have access

to Ohio's workforce development system. Information about programs, partners, and services available at OhioMeansJobs centers was provided to our staff by center and area staff. Our staff was unable to conduct detailed analyses due to the variances in reporting by center. Further, OWD and its partner organizations provide programs and services that fall outside of WIOA requirements, but the Department does not track performance data outside of what is federally mandated. Department oversight is limited by the lack of data and communication between OWD and its partner organizations.

Our audit resulted in nine recommendations that would improve the overall effectiveness, efficiency, and transparency of workforce development programming throughout Ohio and increase the accessibility of these programs to individuals seeking out services.

Key Observations

Key Observation 1: To maintain compliance with WIOA regulations, ODJFS is required to collect and report basic performance metrics regarding workforce development program operations. Reports published on the Department's website do not include information beyond what is required to be tracked under WIOA, and ODJFS does not collect additional information. By tracking minimally required performance metrics, the Department is unable to conduct ongoing performance review regarding the impact of specific programs and activities.

Key Observation 2: ODJFS is unable to efficiently provide detailed expenditure information regarding the use of federal funds that are set aside for statewide workforce development programming. This funding is typically in the form of multi-year grants that can be used for a variety of purposes, While the majority of funding is used for things such as administrative expenses or additional support to Local Areas, it was not possible to efficiently identify the actual amount of money spent on actual projects and initiatives undertaken at the statewide level in a given fiscal year. Further, there was limited information regarding how this statewide set-aside funding is distributed to or used by the Local Areas.

Key Observation 3: Local expenditures are not tracked centrally in a manner that would allow for the effective and efficient review of program specific spending levels.

Key Observation 4: The state is divided into 20 Local Areas that each provide services to the community. This regional structure is intended to allow for each area to address the needs of its specific community. However, The Greater Ohio Workforce Board or Area 7, contains 43 counties and contains a variety of communities throughout the state, perhaps limiting its ability to provide effective and efficient services.

Key Observation 5: Individuals are required to provide information regarding work search activities through the unemployment portal. Any individual who fails to comply with this requirement may be denied unemployment benefits. While this is a requirement tied to unemployment insurance compensation, ODJFS currently has no process in place that confirms the validity of work search activities in real-time.

Key Observation 6: The Department does not match financial data with program performance. This prevents detailed program performance evaluations because it is not possible to determine the cost effectiveness of services. Matching this data would allow for improved strategic planning at both the statewide and local levels.

Key Observation 7: Individuals receiving unemployment benefits are required to engage in two approved work search activities per week. Ohio's requirement is lower than the national average of three weekly work search activities.

Summary of Recommendations

Recommendation 1: WIOA requires that local workforce development areas be structured to serve the needs of the local community. Ohio's current structure includes one area that contains nearly half the counties in the state. This area would not meet the WIOA requirements of being consistent with labor markets and being consistent with regional economic development areas if it was not grandfathered in following the enactment of the Act. Further, Ohio is one of only five states with Local Areas that are noncontiguous. The large and noncontiguous nature of this area and its impact on Ohio's workforce system may be introducing barriers to Ohioans in need of assistance in finding work. Existing local areas should work with OWD to consider the impact of the current structure on service delivery and determine whether reconfiguring local workforce areas to be consistent with current WIOA standards would better meet the needs of Ohio job seekers and businesses. This evaluation should include the potential impact on Ohio's regional planning efforts, workforce development accessibility, and the system's financial integrity.

Recommendation 2: There are 88 OhioMeansJobs centers located throughout the state that offer workforce development services. While there is at least one comprehensive center in each local workforce area, 66 of the OhioMeansJobs centers offer only a select number of programs or services. OWD does not maintain a database of programs, partners, and services available at each OhioMeansJobs center, which makes it difficult for Ohioans to identify which center in their area would best suit their individual needs. OWD should work with OhioMeansJobs centers to compile a list of services and programs available at each center and publish it so that Ohioans can easily access this information. This information should be updated regularly to ensure accurate information is presented to the public.

Recommendation 3: Case managers and OhioMeansJobs Center staff members are responsible for performing a variety of functions related to program and service delivery, oftentimes requiring specialized skills and training. However, there is currently limited job-specific training for these individuals available from OWD. OWD should work to develop and deploy effective training for case managers and other staff to improve their understanding of policies, procedures, and systems.

This training could be modeled off the success of the WIOA Youth/ CCMEP trainings, which are offered by OWD.

Recommendation 4: The structure of workforce development in Ohio and the shared responsibility for program administration by both ODJFS and Local Areas requires communication both between ODJFS and Areas and amongst the Areas themselves. Currently, there is no formalized platform for regular communication that ensures consistent messaging and level of access of information. ODJFS should work to develop communications methods that allow for regular collaboration and sharing of information at all levels of workforce development management. In doing so, the Department will allow for the sharing of best practices and innovative ideas at the OhioMeansJobs Center level and also ensure that opinions and viewpoints are heard and acknowledged.

Recommendation 5: Financial data, such as allocations and expenditures, for Local Areas is not collected by ODJFS in a centralized location. OWD should publish financial allocation and expenditure data by workforce program and Local Workforce Area to aid in oversight and strategic planning of Ohio's workforce programs. Additionally, ODJFS should utilize this data, coupled with the federally required performance measures, to evaluate the effectiveness of programs (see **Recommendation 6**). Publishing what funding is received and how much is spent will allow for greater oversight of Ohio's Workforce System, which could lead to increased efficiencies in the distribution and use of workforce funds and improved transparency.

Recommendation 6: The Department receives wage data on a quarterly basis from Ohio employers for purposes of administering the Unemployment Insurance Program. This data is shared with local workforce development areas for specific and limited purposes related to case management. While existing data sharing agreements do not allow for additional uses of this data, OWD should consider reporting aggregated data related to wages and case management to areas for purposes of improved strategic planning efforts. Combining this information with allocation and expenditure data would allow for evaluation of programmatic effectiveness (see **Recommendation 5**).

Recommendation 7: OMJ.com is an online job board sponsored and operated by ODJFS that provides career development resources along with job postings. The state board, which includes the Department, is required by law to track and report a variety of performance metrics related to the website and its use. However, certain data is not provided to ODJFS by its vendor, limiting the state board's ability to remain in compliance with state law. The state board and the Department should evaluate the data that is currently being tracked on OMJ.com and evaluate what information is necessary to effectively evaluate the success of the online job board. In doing so, the Department will be able to better assist individuals who are using the tools and resources available on OMJ.com to seek out employment opportunities.

Recommendation 8: When individuals receive unemployment insurance benefits, they are required to engage in regular work search efforts. The Department requires that, beginning in the first week, individuals filing for unemployment benefits conduct two approved active search for

work activities and continue for each week they file a claim for benefits. Additionally, claimants must participate in reemployment activities by their eighth week of claiming benefits. ODJFS should reevaluate what activities qualify as a work search activity, and when these activities are required to be completed in order to maximize positive outcomes. Further, employees are required by law to accept an offer of suitable work. Employers are able to report non-compliance with this requirement directly to ODJFS using the *Eligibility Notice/Refusal to Return to Work Form* on the Department's website. ODJFS should ensure that employers are aware of and actively using this form, when appropriate.

The Department relies on Benefits Accuracy Measurement (BAM) as a way to conduct quality control assessments on benefits that were paid in the previous year. One of the variables tracked by BAM is work search activities. It should be noted that BAM uses data from the previous year for analysis purposes and is not meant to be used for real-time data analysis purposes. ODJFS does not conduct any additional tracking or review of the validity of work search activities prior to the payment of benefits, which limits its ability to prevent fraud. While the use of BAM and lack of real-time tracking was likely the best available option for identifying overpayments due to non-compliance with the work search requirements when this process was first initiated, it is now inadequate, as indicated by the billions of dollars in benefits over payments identified during the COVID-19 pandemic and is a weakness of internal controls. ODJFS should consider redesigning how it reviews and validates work search activities and leverage modern IT systems to identify fraudulent claims prior to payment.

Recommendation 9: ODJFS requires that individuals who receive unemployment compensation benefits create an account with OhioMeansJobs.com. This website is operated independently from the unemployment compensation system and necessitates a secondary log-in. As a part of enrollment into OhioMeansJobs.com, several emails are sent to the individual, and these emails may contain confidential personal information. The Department should evaluate the IT security controls and processes in place related to unemployment compensation account set-up and OhioMeansJobs.com registration to help ensure personally identifiable information is being protected from unauthorized use and that protocols used to facilitate the registration process with OhioMeansJobs.com are secure and limit the amount of personal information being communicated via email or other unsecure modes of transportation.

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Introduction

In 2021, the Ohio Auditor of State released three audits of the Ohio Department of Job and Family Services (ODJFS or the Department). Two of these audits were conducted in response to concerns regarding the administration of the State's unemployment compensation program and how the unprecedented number of unemployment claims resulting from the COVID-19 pandemic were processed. During the course of these audits, further questions were raised regarding the effectiveness of programs designed to assist individuals attempting to re-enter the workforce.

The federal government, through the Workforce Innovation and Opportunity Act (WIOA), provides funding to states that is intended to promote workforce development through job search assistance, career counseling, and training. The Department, along with local Workforce Development Boards throughout the state, is responsible for administering the programs and activities that are funded by WIOA.

As the job market has attempted to recover from the pandemic job losses, Ohio employers continue to struggle to find well-qualified workers to fill open positions. This audit in the public interest was initiated to review the Department's Office of Workforce Development and associated programs to identify opportunities for improved efficiency, effectiveness, and transparency. Our audit, conducted by the Ohio Performance Team, was initiated to answer questions in the public interest to determine issues and barriers relating to reemployment efforts in Ohio.

Department Overview

ODJFS is a cabinet-level agency that is led by a Director that is appointed by the Governor. The Department is divided into 15 offices and has approximately 2,600 employees² that provide a variety of services to Ohioans, including:

- Cash and Food Assistance: The Department provides a variety of financial and other support services to low-income families and individuals, most of whom are employed or seeking employment.
- Child Care: The Department offers financial assistance for eligible parents while they engage in work, education or job training. The Department is also responsible for licensing and inspecting childcare facilities.

¹ This audit was conducted using Generally Accepted Government Auditing Standards guidelines; see <u>Appendix A</u> for more details.

² In addition to the administration of programs, ODJFS distributes fundings to more than 150 agencies throughout the state which also provide assistance services to Ohioans.

- **Child Support:** The Department collects and distributes child support throughout the state. The program is administered locally by county child support agencies.
- Child Protective Services: The Department oversees the state's child protective service programs including those that prevent child abuse and neglect, provide services to abused and/or neglected children, and license foster homes and residential facilities.
- Adult Protective Services: The Department oversees the state's adult protective services program, which helps vulnerable adults over the age of 60 who are in danger of harm, cannot protect themselves, and may have no one to assist them.
- Employment Services: The Department oversees a variety of employment-related services for Ohioans. Many of these services are provided by OhioMeansJobs (OMJ) centers located throughout the state. These centers offer job training and other employment services to Ohioans looking for work. Many of these services are also found on OhioMeansJobs.com, which is operated by ODJFS.
- **Unemployment Insurance:** The Department administers the state's unemployment insurance program, which provides short-term income to unemployed workers who lose their jobs through no fault of their own.

In State Fiscal Year (SFY) 2021, the Department had an annual budget appropriation of approximately \$3.6 billion. Many of the programs and services provided by the Department are funded by the federal government and operate as a federal-state partnership. Notably, more than 70 percent of the Department's average annual expenditures are federally funded. Many of these programs have specific requirements for how funds may be used by the Department.

Office of Workforce Development

The Office of Workforce Development (OWD or the Office) manages programs that help jobseekers and employers across the state. These programs include opportunities for jobseekers to train and develop their skills as well as opportunities for employers to attract, retain, and develop employees. The Office has approximately 400 positions and distributes funding to Local Workforce Areas (Areas) throughout the state. In each of these Areas, there are a number of centers that provide workforce development services, such as job training. Resources and programs are provided both on a statewide level through OhioMeansJobs.com and through OhioMeansJobs (OMJ) centers located throughout the state. A sample of the types of services offered, and the individuals who might seek out such services are listed in the graphic on the following page.

Examples of Services Available through OhioMeansJobs Centers³

Basic Career Services

WHO

All individuals seeking employment and training services

Individualized Career Services

WHO

Individuals that center staff determine need individualized career services to obtain or retain employment

Business Services

WHO

Businesses in the local area

WHAT

- Eligibility Determination
- Initial Assessments
- Labor Exchange Services

WHAT

- Comprehensive & Specialized Assessments
- Individual Employment Plan
- Financial Literary Services

WHAT

- Workforce Retention
- Screening Assistance for Employers
- Provision of Labor Market Information

Administering workforce systems in Ohio is complex. Key individuals and elements of the Ohio's workforce governance structure are described below.

- Governor: Determines list of eligible WIOA service providers, designates local workforce areas, drafts and submits Unified Statewide Plan, sits on the State Workforce Development Board, certifies Local Workforce Development Boards, has the right to reserve WIOA funds prior to distribution, approve Local Workforce Development Board (LWDB) fund transfers between Adult and Dislocated Worker activities, and appoints members to the Governor's Executive Workforce Board, otherwise known as the State Workforce Development Board.
- State Workforce Development Board: The State Workforce Development Board advises the Governor on the development, implementation and status of Ohio's workforce system and engages communities, state agencies, and stakeholders in Ohio to identify ways to prepare Ohioans with skills needed for in-demand jobs.
- **ODJFS:** Administers WIOA funding, creates policies for the local areas to follow, and oversees Ohio's Workforce system.
- Chief Elected Officials: Appoints members to LWDB and requests LWDB certification, designates fiscal agent, agrees with LWDB in developing and entering MOU(s) between the LWDB and the one-stop-partner.

³ Full tables of the services available through OhioMeansJobs Centers are in the Appendix.

- **Fiscal Agents:** The appropriate role of the fiscal agent is limited to accounting and funds management functions rather than policy or service delivery.
- Local Workforce Development Boards: Members of the board are appointed by Chief Elected Officials, oversee OMJ delivery system and services (not provide them), provide strategic and operational oversight in alignment with Ohio's workforce vision and goals.
- Areas, Counties, Regions: 20 areas encompassing all 88 counties, administer workforce development activities, submit local plans (one for each area) and regional plan (10 regions, each regional plan needs to illustrate how each corresponding area fits into the regional plan).
- One Stop Centers (OhioMeansJobs): Federally mandated to serve communities by functioning as the primary public resource job and career counseling, training, job searching, and employment services. Each of Ohio's 88 counties have one OMJ Center which oversee and manage the implementation of the Workforce Delivery System. 22 OMJ Centers are comprehensive centers which provide guaranteed access to a wide array of federally required programs. 66 OMJ Centers are affiliate sites which serve as locations to supplement access to the Workforce Delivery System.
- One Stop Centers Partners: Required and voluntary partners, can be state or local government entity, company or organization, provide workforce services to participants, and contribute to shared costs of operating a one stop center in addition to serving clients.
- One Stop Center Operators: Selected by the Local Workforce Development Board and can be state or local government entity, company or organization, operates OhioMeansJobs centers and coordinates the activities of partners.

Workforce Innovation and Opportunity Act

Employment services offered by OWD are funded almost exclusively through federal programs. These programs are authorized by WIOA, which was signed into law in 2014. WIOA is designed to be a demand-driven workforce development system that is responsive and relevant to the needs of local employers. There are five Titles, or sections, of the legislation, which direct funding to specific activities:

- **Title I: Workforce Development Activities**, which authorizes job training and related services to unemployed or underemployed individuals. Title I also establishes the governance and performance accountability system for WIOA. There are three main programs funded through Title I; adult, dislocated worker, and youth.
- **Title II: Adult Education and Literacy**, which authorizes education services to assist adults in improving basic skills, completing secondary education, and transitioning to postsecondary education.
- Title III: Amendments to the Wagner-Peyser Act, which amended existing legislation to integrate the U.S. Employment Service into the One-Stop system authorized by WIOA.

- Title IV: Amendments to the Rehabilitation act of 1973, which amended existing legislation to authorize employment-related vocational rehabilitation services to individuals with disabilities and to integrate those services into the One-Stop system.
- **Title V: General Provisions**, which outlined provisions related to the transition to WIOA from the previous workforce development legislation, the Workforce Investment Act of 1998.

Title I and Title III are administered by ODJFS, while Title II is administered by the Ohio Department of Higher Education and Title IV is administered by Opportunities for Ohioans with Disabilities. In FFY 2021, programs and activities authorized under Title I of WIOA represented \$5.5 billion, or 54 percent of all WIOA related spending, nationwide. Distribution of WIOA funds is based on federally established formulas. Ohio received a total of approximately \$125 million in funding for Title I programs in SFY 2021 to be administered at the states' 20 workforce investment areas and statewide use. Approximately \$97 million was used for workforce investment areas and \$28 million was used for statewide activities.

Title I Programs

Title I of WIOA authorizes programs and activities that support job training and related services to unemployed and underemployed individuals as well as continuing the One-Stop system that was established in 1998 by The Workforce Investment Act. The One-Stop system is in place as a means of delivering these workforce development activities. Of the six core WIOA programs, Title I encompasses three programs: Adult, Youth, and Dislocated Worker.

Adult Activities

This program is structured around two primary levels of services: career services and training. Career services⁴ consist of basic services and individual services. Basic services include self-help services that require minimal staff assistance, including providing jobseekers with labor market information. Individual services are staff-supported activities completed if it is determined that more support is necessary for a jobseeker to obtain to retain employment. Individual services include skills assessments, counseling, and the development of an individual employment plan. Access to these career services are universal – participants do not need to use the basic service prior to seeking individual services and vice versa. Training includes occupational skills, on the job training, and skill upgrading, and individuals must be assessed as eligible to receive training services.

⁴ Tables with all Basic Services, Individual Services, and Business Services available at select OhioMeansJobs Centers are in **Appendix B**.

Dislocated Worker

These activities are generally the same services as the adult program, with the only difference being eligibility requirements. A worker is considered dislocated if they have been terminated, laid off, or notified of an upcoming termination or lay off. From the perspective of the program participant the classification of "adult" or "dislocated" does not make a difference in the services received under WIOA.

Youth Program

Eligibility for the Youth Activities program is different depending on whether the individual is an "out-of-school" youth or an "in-school" youth. Individuals who are classified as "out-of-school" youths are not attending any school, between the ages of 14 and 21 and at least one of the following:

- school dropout;
- student who has not attended school the most recent quarter;
- low-income, basic skill deficient;
- English Language Learner;
- Involved with the justice system (juvenile or adult);
- Homeless or out of home placement;
- Pregnant or already a parent;
- Disabled; or,
- Low-income individual requiring additional assistance to complete an educational program or to secure employment.

By comparison, individuals who are classified as "in-school" youths are attending school, low-income, between the ages of 16 and 24, and one of the following:

- Basic skill deficient;
- English language learner;
- Involved with the justice system (juvenile or adult);
- Homeless or out of home placement;
- Pregnant or already a parent;
- Disabled; or,
- Requiring additional assistance to complete an educational program or to secure and hold employment

WIOA requires that 75 percent of all Youth Activities funds need to be used for out of school youth activities. Additionally, 20 percent of allocated funds need to be used to provide in-school and out-of-school participants with paid and unpaid work experiences that have an academic and occupational educational component. Local programs must provide the following activities for youths under WIOA:

- Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies leading to completion of secondary school;
- Alternative secondary school services, as appropriate;
- Paid and unpaid work experiences that have an academic and occupational education component, including summer employment opportunities and pre-apprenticeship programs;
- Occupational skill training, as appropriate;
- Education offered with training for a specific occupation or cluster;
- Leadership development opportunities;
- Supportive services,⁵
- Adult mentoring for the period of participation and a subsequent period for a total of not less than 12 months;
- Follow-up services for not less than 12 months after the completion of participation, as appropriate;
- Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral as appropriate;
- Financial literacy education;
- Entrepreneurial skills training;
- Labor market and employment information; and,
- Activities to prepare youth to transition to postsecondary education and training.

While the 14 activities listed above need to be made available, each service does not necessarily need to be used by each participant.

Regional Structure

WIOA was created to allow for regional planning and local control of workforce development systems administration and implementation. This regional focus was intended for the services provided to be better tailored to the needs of the local economy and may allow the services and programs provided to be more relevant to both the local jobseeker and local businesses.

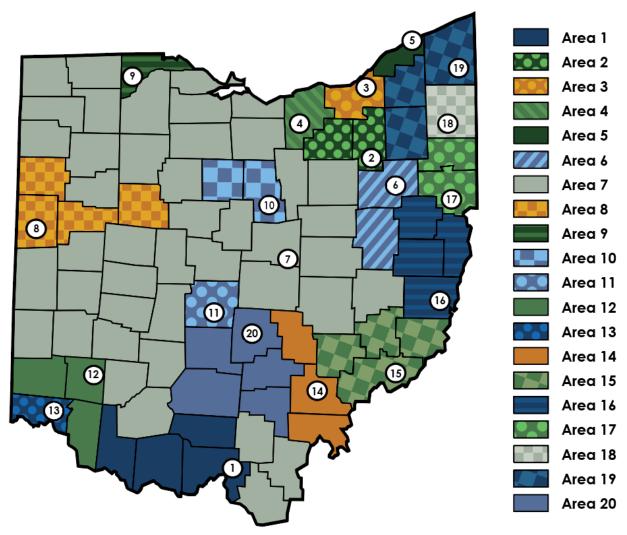
Ohio's local workforce Areas have changed over time. Beginning in 2001, after the passage of the Workforce Investment Act, which was the precursor to WIOA, there were seven local Areas, one of which contained 78 of Ohio's 88 counties. The number of Areas has grown over time, and there are now 20 local Areas. It should be noted that while the number of Areas has grown, Area 7, which originally contained 78 counties continues to be larger than the other Areas and currently contains 43 counties. The map on the following page shows the current structure of each of the 20 Areas.

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⁵ Supportive services include transportation, childcare, dependent care, housing, and needs-related payments.

Map of Ohio's Local Workforce Areas



Notably, as seen in the map, Area 7, which is represented by the light green color, is non-contiguous and covers a variety of areas within the state including suburban, rural, and Appalachian counties. As discussed in **Recommendation 1**, this may limit the Area's ability to address the needs of the local communities that it serves.

Counties and Centers in Local Workforce Areas

Area	Area Name	Counties	Affiliate Centers	Comprehensive Centers
Area 1	Workforce Development Board Area 1	Scioto, Adams, Brown, Pike	3	1
Area 2	Summit and Medina Workforce Area	Summit, Medina	1	1

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Area 3	Cleveland/Cuyahoga Workforce Board	Cuyahoga	0	1
Area 4	Lorain County Workforce Development Board	Lorain	0	1
Area 5	Lake County Workforce Development Board	Lake	0	1
Area 6	Stark Tuscarawas County Workforce Development Board	Stark, Tuscarawas	1	1
Area 7	Greater Ohio Workforce Board, Inc.	Allen, Fayette, Jackson, Muskingum, Williams, Ashland, Fulton, Knox, Ottawa, Wood, Champaign, Gallia, Lawrence, Paulding, Wyandot, Clark, Greene, Erie, Licking, Preble, Clinton, Guernsey, Logan, Putnam, Coshocton, Hancock, Madison, Union, Sandusky, Darke, Henry, Marion, Seneca, Defiance, Highland, Miami, Shelby, Delaware, Holmes, Montgomery, Huron, Morrow, Wayne	41	2
Area 8	Ohio Area 8 Workforce Development Board	Van Wert, Mercer, Auglaize, Hardin	3	1
Area 9	Lucas County Workforce Development Board	Lucas	0	1
Area 10	Area 10 Richland-Crawford Workforce Development Board	Crawford, Richland	1	1
Area 11	Workforce Development Board of Central Ohio	Franklin	0	1
Area 12	Workforce Investment Board of Butler Clermont Warren	Butler, Warren, Clermont	2	1
Area 13	The Southwest Ohio Region Workforce Investment Board	Hamilton	0	1
Area 14	Area 14 Workforce Development Board	Perry, Athens, Meigs	2	1
Area 15	Ohio Valley Employment Resource	Morgan, Noble, Monroe, Washington	3	1

Area 16	Workforce Development Board Area 16	Carroll, Jefferson, Harrison, Belmont	2	2
Area 17	Workforce Development Board, Inc. of Mahoning and Columbiana Counties	Mahoning, Columbiana	1	1
Area 18	Trumbull County Workforce Development Board	Trumbull	0	1
Area 19	Northeast Ohio Consortium Council of Government Area 19 Workforce Development	Ashtabula, Geauga, Portage	2	1
Area 20	South Central Ohio Workforce Partnership	Fairfield, Pickaway, Ross, Hocking, Vinton	4	1

Source: Ohio Workforce Association

Workforce Development Funding

As previously mentioned, nearly all funding for workforce development activities is provided by the federal government through WIOA. Funding for each state is identified by the federal government using several factors including unemployment levels, economic factors, and overall share of the Civilian Labor Force (CLF). The CLF includes individuals 16 or older who are employed or have sought employment in the past four weeks. The majority of WIOA funding is sent to local areas, however the Governor has the discretion to reserve funds from each of the three Title I program areas. Up to 15 percent of funds from each program area may be reserved and pooled to be used on any statewide workforce investment activities, regardless of the source of funding. An additional 25 percent of funding from the displaced worker program area may be reserved for rapid response activities. These rapid response activities are meant to help dislocated workers obtain reemployment as quickly as possible.

Rapid Response Activities

Ohio's rapid response programming is intended to avert or mitigate employer layoffs and closure events. The state provides a series of activities to asset dislocated workers in obtaining reemployment as soon as possible when certain circumstances occur.

Between May, 2022 and November, 2022, OWD was alerted to 69 closures or events that impacted approximately 5,700 workers. In response to these events, OWD hosted rapid response sessions and held partner meetings.

OWD approved 40 SharedWork Ohio plans, which allowed workers to remain employed with reduced hours while being retrained. These plans impacted 1,250 workers.

As previously mentioned, Ohio received approximately \$125 million in total funding from Title I in FY 2021. This funding was split between the three categories, Adult Activities, Dislocated Worker Activities, and Youth Activities. The following table shows the breakdown of funding by category and the amount allocated to Workforce Investment Areas compared to the amount reserved for statewide use. The Governor opted to reserve the maximum amount of funding from

each category for use in statewide programs in FY 2021.⁶ While the majority of this funding is used for things such as administrative expenses or additional support to Local Areas, it was not possible to efficiently identify the actual amount of money spent on specific programs and initiatives undertaken at the statewide level in a given fiscal year. Further, there was limited information regarding how this statewide set-aside funding is distributed to or used by the Local Areas.

Ohio's Title I Funding for State FY 2021

	Workforce		
WIOA Category	Investment Area	Statewide Use ¹	Total Allocation
Dislocated Worker	\$22,308,923	\$14,872,616 ²	\$37,181,539
Youth	\$38,672,141	\$6,824,496	\$45,496,637
Adult	\$36,052,176	\$6,362,144	\$42,414,320
Total	\$97,033,240	\$28,059,256	\$125,092,496

Source: March 2021 Redbook LBO Analysis of Executive Budget Proposal for ODJFS

Funding for the individual areas is allocated by ODJFS. The Adult Activities funding and Youth program funding is allocated in a manner that is similar to the federal allocation, taking into account the population of each area. The Dislocated Worker funding is allocated using a formula that takes into account six factors on a weighted basis. The table on the following page shows the funding allocation by area and by funding type for FY 2021.

Funding by Area and Title I Program in FY 2021

	Dislocated				
Area	Worker	Youth	Adult	Total	% Total
1	\$1,062,524	\$1,477,150	\$1,475,418	\$4,015,092	4.1%
2	\$1,022,329	\$1,713,047	\$1,632,951	\$4,368,327	4.5%
3	\$2,474,677	\$5,255,697	\$5,047,752	\$12,778,126	13.2%
4	\$758,589	\$1,455,355	\$1,382,105	\$3,596,049	3.7%
5	\$355,360	\$618,640	\$596,987	\$1,570,987	1.6%
6	\$819,977	\$1,398,909	\$1,355,677	\$3,574,563	3.7%
7	\$5,367,318	\$8,821,827	\$7,929,677	\$22,118,822	22.8%

⁶ The Governor can reserve up to 15 percent of funding for Adult, Dislocated Worker, and Youth programs. An additional 25 percent can be reserved for Dislocated Workers for specific use, such as Rapid Response activities.

¹ Primarily used for state payroll and includes the 5 percent maximum reserved for administration purposes. Additional activities include but are not limited to: supplemental funding to WIOA Areas who experience high volume of participants, pilot projects, initiatives from the Governor's Office, or IT maintenance/enhancements to case management or fiscal systems. Funds may also be requested from Local Areas, non-profit organizations, and sister State Agencies to fund projects.

² Statewide use for Dislocated Worker is 40 percent, as Ohio sets aside the additional 25 percent for Rapid Response Mass Layoff and Layoff Aversion Projects.

Total	\$22,308,923	\$38,672,141	\$36,052,176	\$97,033,240	-
20	\$512,191	\$711,902	\$782,419	\$2,006,512	2.1%
19	\$602,300	\$1,165,471	\$986,631	\$2,754,402	2.8%
18	\$1,319,864	\$1,823,567	\$1,747,099	\$4,890,530	5.0%
17	\$1,246,334	\$2,183,187	\$2,129,925	\$5,559,446	5.7%
16	\$751,671	\$1,116,590	\$1,077,291	\$2,945,552	3.0%
15	\$656,818	\$841,761	\$817,409	\$2,315,989	2.4%
14	\$501,588	\$1,113,744	\$880,562	\$2,495,894	2.6%
13	\$948,053	\$1,743,292	\$1,633,375	\$4,324,720	4.5%
12	\$904,993	\$1,521,497	\$1,367,735	\$3,794,225	3.9%
11	\$1,552,254	\$2,653,135	\$2,295,129	\$6,500,518	6.7%
10	\$291,324	\$563,023	\$570,490	\$1,424,837	1.5%
9	\$999,622	\$2,243,825	\$2,108,846	\$5,352,293	5.5%
8	\$161,135	\$250,521	\$234,691	\$646,347	0.7%

Source: March 2021 Redbook LBO Analysis of Executive Budget Proposal for ODJFS

The amount of funding provided to each Area varies greatly, with Area 7 receiving significantly more funding than any other area. This variance is largely due to the variation in size and population within each area. Because Area 7 is so much larger than the other Areas, it is not unexpected that it receives more funding than the others. While we attempted to review spending on an Area basis, data is not currently kept in a way that enables for the efficient review of how funding is spent on a local level.

What We Looked At

We examined the programs and operations of the Office of Workforce Development. This review included an examination of area operations including the services offered at the state's One-Stop centers. We additionally reviewed the success of OhioMeansJobs.com as it relates to effectively helping Ohioans obtain meaningful employment.

As a result of our previous audits of ODJFS and the unemployment insurance program, we also reviewed issues related to work search criteria for individuals that collect unemployment insurance. In particular, we attempted to determine the effectiveness of this requirement in assisting employers and employees in filling open positions. We also conducted a review of the Department's policies and procedures regarding the communication of confidential personal information relating to unemployment benefits and an individual's OhioMeansJobs.com profile.

Why We Looked At It

This examination was conducted, in part, in response to the fraud that was identified in the unemployment insurance program during the pandemic along with constituent inquiries and concerns that were relayed to the Auditor of State. A well-qualified workforce is critical to the long-term success of the state. Many of the programs administered by OWD are intended to ensure Ohio's workforce are able to obtain the skills necessary to meet the demand of employers. Because the system of governance for workforce development is complex and multifaceted, it is important that the public is aware of how funding is utilized. Our audit was conducted to identify opportunities to improve the effectiveness, efficiency, and transparency of the state's workforce development efforts.

What We Found

Recommendation 1: WIOA requires that local workforce development areas be structured to serve the needs of the local community. Ohio's current structure includes one area that contains nearly half the counties in the state. This area would not meet the WIOA requirements of being consistent with labor markets and being consistent with regional economic development areas if it was not grandfathered in following the enactment of the Act. Further, Ohio is one of only five states with Local Areas that are noncontiguous. The large and noncontiguous nature of this area and its impact on Ohio's workforce system may be introducing barriers to Ohioans in need of assistance in finding work. Existing local areas should work with OWD to consider the impact of the current structure on service delivery and determine whether reconfiguring local workforce areas to be consistent with current WIOA standards would better meet the needs of Ohio job seekers and businesses. This evaluation should include the potential impact on Ohio's regional planning efforts, workforce development accessibility, and the system's financial integrity.

Recommendation 2: There are 88 OhioMeansJobs centers located throughout the state that offer workforce development services. While there is at least one comprehensive center in each local workforce area, 66 of the OhioMeansJobs centers offer only a select number of programs or services. ODJFS does not maintain a database of programs, partners, and services available at each OhioMeansJobs center, which makes it difficult for Ohioans to identify which center in their area would best suit their individual needs. OWD should work with OhioMeansJobs centers to compile a list of services and programs available at each center and publish it so that Ohioans can easily access this information. This information should be updated regularly to ensure accurate information is presented to the public.

Recommendation 3: Case managers and OhioMeansJobs Center staff members are responsible for performing a variety of functions related to program and service delivery, oftentimes requiring specialized skills and training. However, there is currently limited job-specific training for these individuals available from ODJFS. OWD should work to develop and deploy effective

training for case managers and other staff to improve their understanding of policies, procedures, and systems.

This training could be modeled off the success of the WIOA Youth/ CCMEP trainings, which are offered by the Department.

Recommendation 4: The structure of workforce development in Ohio and the shared responsibility for program administration by both ODJFS and Local Areas requires communication both between ODJFS and Areas and amongst the Areas themselves. Currently, there is no formalized platform for regular communication that ensures consistent messaging and level of access of information. ODJFS should work to develop communications methods that allow for regular collaboration and sharing of information at all levels of workforce development management. In doing so, the Department will allow for the sharing of best practices and innovative ideas at the OhioMeansJobs Center level and also ensure that opinions and viewpoints are heard and acknowledged.

Recommendation 5: Financial data, such as allocations and expenditures, for Local Areas is not collected by ODJFS in a centralized location. OWD should publish financial allocation and expenditure data by workforce program and Local Workforce Area to aid in oversight and strategic planning of Ohio's workforce programs. Additionally, ODJFS should utilize this data, coupled with the federally required performance measures, to evaluate the effectiveness of programs (see **Recommendation 6**). Publishing what funding is received and how much is spent will allow for greater oversight of Ohio's Workforce System, which could lead to increased efficiencies in the distribution and use of workforce funds and improved transparency.

Recommendation 6: The Department receives wage data on a quarterly basis from Ohio employers for purposes of administering the Unemployment Insurance Program. This data is shared with local workforce development areas for specific and limited purposes related to case management. While existing data sharing agreements do not allow for additional uses of this data, OWD should consider reporting aggregated data related to wages and case management to areas for purposes of improved strategic planning efforts. Combining this information with allocation and expenditure data would allow for evaluation of programmatic effectiveness (see **Recommendation 5**).

Recommendation 7: OMJ.com is an online job board sponsored and operated by ODJFS that provides career development resources along with job postings. The state board, which includes the Department, is required by law to track and report a variety of performance metrics related to the website and its use. However, certain data is not provided to ODJFS by its vendor, limiting the state board's ability to remain in compliance with state law. The state board and the Department should evaluate the data that is currently being tracked on OMJ.com and evaluate what information is necessary to effectively evaluate the success of the online job board. In doing so, the Department will be able to better assist individuals who are using the tools and resources available on OMJ.com to seek out employment opportunities.

Recommendation 8: When individuals receive unemployment insurance benefits, they are required to engage in regular work search efforts. The Department requires that, beginning in the first week, individuals filing for unemployment benefits conduct two approved active search for work activities and continue for each week they file a claim for benefits. Additionally, claimants must participate in reemployment activities by their eighth week of claiming benefits. ODJFS should reevaluate what activities qualify as a work search activity, and when these activities are required to be completed in order to maximize positive outcomes. Further, employees are required by law to accept an offer of suitable work. Employers are able to report non-compliance with this requirement directly to ODJFS using the *Eligibility Notice/Refusal to Return to Work Form* on the Department's website. ODJFS should ensure that employers are aware of and actively using this form, when appropriate.

The Department relies on Benefits Accuracy Measurement (BAM) as a way to conduct quality control assessments on benefits that were paid in the previous year. One of the variables tracked by BAM is work search activities. It should be noted that BAM uses data from the previous year for analysis purposes and is not meant to be used for real-time data analysis purposes. ODJFS does not conduct any additional tracking or review of the validity of work search activities prior to the payment of benefits, which limits its ability to prevent fraud. While the use of BAM and lack of real-time tracking was likely the best available option for identifying overpayments due to non-compliance with the work search requirements when this process was first initiated, it is now inadequate, as indicated by the billions of dollars in benefits over payments identified during the COVID-19 pandemic and is a weakness of internal controls. ODJFS should consider redesigning how it reviews and validates work search activities and leverage modern IT systems to identify fraudulent claims prior to payment.

Recommendation 9: ODJFS requires that individuals who receive unemployment compensation benefits create an account with OhioMeansJobs.com. This website is operated independently from the unemployment compensation system and necessitates a secondary log-in. As a part of enrollment into OhioMeansJobs.com, several emails are sent to the individual, and these emails may contain confidential personal information. The Department should evaluate the IT security controls and processes in place related to unemployment compensation account set-up and OhioMeansJobs.com registration to help ensure personally identifiable information is being protected from unauthorized use and that protocols used to facilitate the registration process with OhioMeansJobs.com are secure and limit the amount of personal information being communicated via email or other unsecure modes of transportation.

Recommendation 1: Adjust Local Workforce Area Structure

WIOA requires that local workforce development areas be structured to serve the needs of the local community. Ohio's current structure includes one area that contains nearly half the counties in the state. This area would not meet the WIOA requirements of being consistent with labor markets and being consistent with regional economic development areas if it was not grandfathered in following the enactment of the Act. Further, Ohio is one of only five states with Local Areas that are noncontiguous. The large and noncontiguous nature of this area and its impact on Ohio's workforce system may be introducing barriers to Ohioans in need of assistance in finding work. Existing local areas should work with OWD to consider the impact of the current structure on service delivery and determine whether reconfiguring local workforce areas to be consistent with current WIOA standards would better meet the needs of Ohio job seekers and businesses. This evaluation should include the potential impact on Ohio's regional planning efforts, workforce development accessibility, and the system's financial integrity.

Impact

Reconfiguring the Local Areas so that they are consistent with labor market areas and regional economic development areas may allow for better delivery of workforce and employment related services to Ohioans.

Background

The Workforce Investment Act (WIA), which was passed by Congress in 1998, required states to develop local workforce investment areas for the purposes of providing services to eligible individuals. During this time, Ohio developed the "Ohio Option" which was designed to give counties more control over workforce development, while also aligning with the needs and requirements of the Temporary Assistance for Needy Families (TANF) program. When this option was created, counties were given additional TANF funding as an incentive for participating in the "Ohio Option." Originally, 78 of Ohio's 88 counties participated in this program. At the time, the state had seven local areas, with the "Ohio Option" being labeled Area 7.

In an audit of Ohio's Workforce Investment Program by the U.S. Department of Labor issued in March 2004, the United States Department of Labor found that Ohio improperly designated the Ohio Option. As a result of this audit, ODJFS issued new guidance to be in compliance with United States Department of Labor standards but did not require counties to leave Area 7 or for the area's size to be reduced. Between 2001 and 2007, the number of counties in Area 7 dropped from 78 counties to 43 counties as counties voluntarily left Area 7 to create new areas or join other existing areas.

WIOA was enacted in July 2014 with the intention of improving coordination among federal workforce development and related programs. After the passage of WIOA, states were required to identify and designate local areas. Each of the preexisting local areas were able to apply for

redesignation. Initially, the State chose to reject Area 7's application for redesignation. The Governor rejected the Area based on its large size, noncontiguous nature, use of eleven subareas, poor performance of some sub-areas, and a relatively "low expenditure rate of allotted funds" which indicated that the Area may not have been providing appropriate service levels since funding is provided using a needs-based formula. However, this decision was appealed by the Ottawa Board of Commissioners to USDOL and the appeal was accepted, as noted in the letter contained in Appendix B, since states were not permitted to use initial designation criteria beyond those explicitly stated in WIOA. WIOA criteria required that states grandfather WIA areas that applied for redesignation if they performed successfully and maintained fiscal integrity under WIA, which Area 7 did.

Methodology

We reviewed the Workforce Development Maps from all 50 states to identify characteristics of Local Workforce Areas and compared this to Ohio's map. We also used documentation provided by the Department to understand the relationship and governing structure between ODJFS, the Local Workforce Governing Boards, and the job centers.

Finally, we evaluated the accessibility of comprehensive centers for Ohioans to identify how easily individuals could access necessary services. We compared the current map to previous iterations, particularly in the number and location of comprehensive centers. We also compared the access to these centers for individuals who were in Area 7 to those individuals who resided outside of Area 7.

Analysis

Ohio is one of five states with at least one noncontiguous Local Workforce Area. The noncontiguous Local Workforce Areas in the four other states are not as separated or have geographical or legal reasons for the separation. In Arizona, the non-contiguous Area is comprised of tribal land throughout the state; California



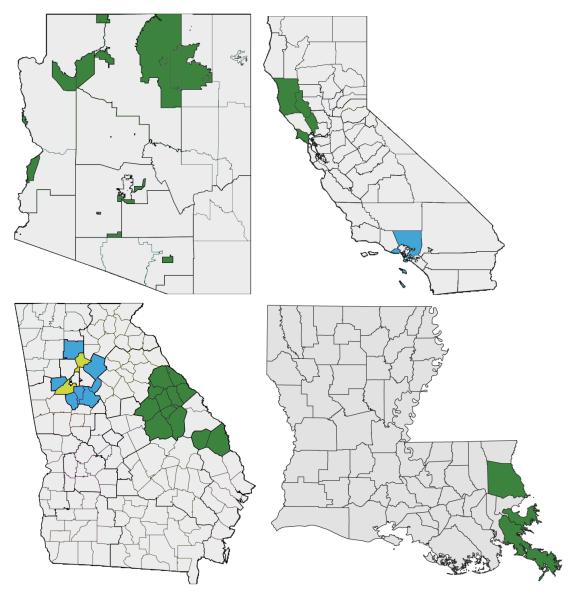
Noncontiguous Areas

The images under the *Other States* with *Noncontiguous Areas* section show the noncontiguous Local Workforce Areas in Arizona, California, Georgia, and Louisiana. Colors highlighted within each map represent each noncontiguous area.

While each state contains at least one noncontiguous area, none are as extreme in the distance of the separation when compared to Ohio's Area 7. Additionally, none of the noncontiguous areas in other states encompass nearly half of the state's geography, unlike Ohio's Area 7.

and Georgia have noncontiguous areas where large cities are carved out of the Area and are separate areas; and, in Louisiana, the noncontiguous area is separated by a waterway.

Other States with Noncontiguous Areas



Source: Review of state maps on the USDOL CareerOneStop website

Area 7

Area 7 in Ohio is composed of 43 counties and stretches from the northwest corner of the state to the southern tip of the state. It includes urban, suburban, and rural areas. These counties included some with the lowest levels of poverty in the state and some with the highest levels of poverty in the state. Due to its size, Area 7 serves a wide variety of populations with disparate local needs.

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WIOA allowed for the initial designation and subsequent designation of local workforce development areas that operated under WIA. For new local workforce development areas, the law requires that the designation include considerations of:

- The state's labor market areas;
- The state's regional economic development areas; and,
- The area's ability to effectively administer activities.

Since Area 7 met redesignation requirements and was grandfathered in, its current structure and size are not required to and do not address these three key points. During the first two program years following the enactment of WIOA, the act required that areas operating during WIA have their designation requests approved, given that the area performed successfully and sustained fiscal integrity under WIA. Both successful performance and fiscal integrity are defined by federal standards. After the initial two program years, the state is required to approve subsequent designation from local areas if the area performed successfully, sustained fiscal integrity, and met regional planning requirements.

Comprehensive Center Access

A comprehensive center is a physical location where job seekers and employer customers can access the programs, services, and activities of all required one-stop partners. The requirements also include having a WIOA title I staff person physically present, providing access to training services, and providing labor market information. Affiliate centers are locations intended to supplement or enhance access to workforce services and are not required to offer access to every program offered at comprehensive centers. If an individual has specific needs to improve their ability to obtain or retain a job, their closest affiliate center may not have the programs, services, or staff necessary to serve them. While individuals residing within a Local Workforce Area are welcome to visit their comprehensive center to receive the full extent of the programs and services available, they may not be able to due to the transportation barriers many jobseekers face. Further, the Department does not maintain a comprehensive list of services and programs offered at affiliate partners (see Recommendation 2), so it may be difficult for individuals to identify what local center might be able to provide necessary services. Because of this, we analyzed the average distance residents of an area would need to travel to access a comprehensive center.

In 2018, Area 7 had 11 comprehensive centers, offering easier access to their resources. Since that time, the number of comprehensive centers has been reduced, and Area 7 currently contains only 2 comprehensive centers in Allen and Knox counties. The map to the right shows the current location of comprehensive and affiliate centers throughout the state. The centers that are identified with a red triangle were previously comprehensive centers within Area 7, but are now affiliate centers.

We analyzed how far an individual must travel, on average, to reach a comprehensive center. Using the map from 2018, we determined that an individual in Area 7 would travel



an average of 28 miles to access a comprehensive center. Using today's map, the average distance is 62 miles for a resident of Area 7. By comparison, while the average distance traveled by a resident of Area 7 is 62 miles, the statewide average for other areas is only 29 miles.

It should be noted that this is an average distance. An individual living in Ironton, Ohio, in the noncontiguous portion of the Area, would likely need to travel more than three hours to reach the comprehensive center for Area 7 located in Mt. Vernon, Ohio. This individual would pass near four other comprehensive centers that service other Areas during this commute. Ironton is a city with a median income of \$38,654 and with 25.8 percent of the population in poverty. With 10.9 percent of households having no vehicles available and 40.8 percent of households with only one vehicle available, transportation is already a significant barrier for the general population. Individuals who are unemployed are even more vulnerable and may not have the resources required to travel 3 hours to receive services from programs not offered within their county⁷.

Reconfiguration

Since Area 7 was not created with the intention of being one cohesive region under the Workforce Investment Act and was grandfathered in under WIOA, Ohio's current Workforce Structure is not cohesive yet cannot be redrawn without cooperation and agreement from counties or repeated Area WIOA performance failures. Reconfiguring Ohio's Local Workforce

⁷ Some OhioMeansJobs Centers have lists that prioritize residents of their Local Workforce Area, however others allow non-residents to utilize services.

Areas would require agreement from any counties that left their current area, as well as agreement from the counties in the Local Workforce Area they would join. Additionally, any reconfigured or new Local Workforce Areas would need to be able to meet local performance accountability measures for their area. While there are significant barriers to reconfiguring Ohio's Local Workforce Areas or establishing additional comprehensive OMJ Centers, these changes may improve the workforce system's ability to meet the needs of Ohio's job seekers and businesses. Area 7's large and non-contiguous nature restricts Ohio's ability to develop Workforce Regions with consistent labor markets or economic development areas. Because each Local Workforce Area is only required to have one comprehensive center, Area 7's large size means that Ohioans who live in the Area have to travel further than residents of other areas do to access the services provided at those locations. Further, due to the noncontiguous nature of the Area, some residents are required to travel past other, closer, comprehensive centers in order to seek out services in the Area.

Conclusion

Under WIOA, local workforce development areas are supposed to be structured so that they serve the needs of the regional job market. However, the law allows for previously identified local workforce areas to continue to exist if minimal criteria are met. Because of this, Area 7 continued to exist with 43 non-contiguous counties rather than be redesignated. The structure of this area may result in Ohioans struggling to easily access beneficial workforce development programs. OWD and the Local Areas must work together to quantify how the current local workforce area structure, its non-contiguous nature and various-sized areas, has an impact on service delivery. Local Workforce Areas should engage in discussions with OWD to plan how to better address the needs of Ohioans. These discussions should include evaluating the reconfiguration of local workforce areas.

Recommendation 2: Track Services and Programs Offered at OhioMeansJobs Center Locations

There are 88 OhioMeansJobs centers located throughout the state that offer workforce development services. While there is at least one comprehensive center in each local workforce area, 66 of the OhioMeansJobs centers offer only a select number of programs or services. OWD does not maintain a database of programs, partners, and services available at each OhioMeansJobs center, which makes it difficult for Ohioans to identify which center in their area would best suit their individual needs. OWD should work with OhioMeansJobs centers to compile a list of services and programs available at each center and publish it so that Ohioans can easily access this information. This information should be updated regularly to ensure accurate information is presented to the public and program participants.

Background

WIOA requires that a variety of programs and services be offered to the public seeking employment assistance. In Ohio, these services are offered through OhioMeansJobs Centers located throughout the state. A variety of partners may provide services at these centers, including ODJFS, County offices of Job and Family Services, other governmental groups, community organizations, and businesses.

Ohio has 22 comprehensive centers and 66 affiliate centers. A comprehensive center is a physical location where job seekers and employer customers can access the programs, services, and activities of all required one-stop partners while affiliate centers make one or more programs, services, and activities available to job seekers and employers. Further, OhioMeansJobs Centers are required by ODJFS to collaborate with at least one local library to offer additional services.

A total of 13 programs must be offered through the local workforce development system. These programs are all available at a comprehensive center, but only a select few may be offered at any individual affiliate center. Required partners are listed in the table below.

Programs Required within Local Areas

Program Name	Details
Programs Authorized Under Title I of Workforce Innovation and Opportunities Act (WIOA)	Includes Adults; Dislocated Workers; Youth; Job Corps; YouthBuild; Native American programs; and Migrant and Seasonal Farmworker (MSFW) programs
Wagner-Peyser Act Employment Service	
Adult Education and Family Literacy Act (AEFLA)	Called Aspire in Ohio
Vocational Rehabilitation	
Senior Community Service Employment Program (SCSEP)	

Career technical education programs at the postsecondary level	Authorized under the Carl D. Perkins Career and Technical Education Act
Trade Adjustment Assistance (TAA)	
Jobs for Veterans State Grants (JVSG)	
Employment and training activities carried out under the Community Services Block Grant (CSBG)	
Employment and training activities carried out by the Department of Housing and Urban Development (HUD)	
Programs authorized under State unemployment compensation laws	
Programs authorized under the Second Chance Act	
Temporary Assistance for Needy Families (TANF)	
Source: ODJFS WIOA Policy Letter No. 16-09.1	

In addition to these required programs, job centers may also have programs provided by voluntary partners. Voluntary partners are optional federal, state, or local entities that are approved by the Local Workforce Development Board to provide services within the workforce system. In Ohio, examples of voluntary partners include community counseling centers, community action councils, and community colleges. Under WIOA guidance, local libraries are provided as a common example of a potential voluntary partner; however, ODJFS policy requires each Center to collaborate with libraries due to the expansive array of services already available at the libraries across the state. These partnerships allow libraries to offer jobseeker assistance to those with transportation difficulties and serve as another means of accessing resources in Ohio's workforce system.

Methodology

We reviewed information in order to identify what programs are available to help Ohioans get back to work through ODJFS. We then worked with OWD to determine what programs and services are available in each Area. Once this review was complete, we determined it was necessary to work with local job center personnel to determine what programs and services are available in each Center.

In order to make valuable comparisons, we collected WIOA service definitions, identified states who include services or programs in center search results via a central search function, identified characteristics of center searches of peer states, and identified characteristics of national AmericanJobCenter search and application programming interfaces (API). Web APIs are tools that allow a source website to share data and information on another website. The AmericanJobCenter Web API allows users like state workforce agencies to take data from the Department of Labor to display on their state's website.

Analysis

There are two ways an individual may find a job center.

OhioMeansJobs.com has a "Find a Job Center" tool which includes the disclaimer, "Services and availability vary by location." Clicking on one of the individual counties listed on the page opens the center's address with a map, but no service or program information is available on the website. The second way which individuals can search for centers is by clicking on "Find a Job Center near you" which pulls up the Ohio Department of Job and Family Services OhioMeansJobs center map. Once the map is pulled up, individuals can either click on a county or select a county from a drop down menu to obtain additional information.

Selecting a county opens the center or area website, or a static PDF in some instances. Content on center or area websites varies, with some providing limited information and others providing a comprehensive list of services offered. The images to the right show the variation in what is provided via the website.

Franklin County, at the top of the page, offers a drop-down menu of services based on need. Wyandot County, in the middle of the page provides a static PDF of location information. And Muskingum County, at the bottom of the page, has a resource center page that lists all services available at the OMJ center. Notably, Muskingum



Workforce Area 7 Wyandot County

OhioMeansJobs Wyandot County 120 E. Johnson Street Upper Sandusky, OH 43351

(419) 294-4977



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County and Wyandot County are both contained within Area 7, indicating that information regarding center level services is not available in a uniform manner at the Area level. We further found, that in at least one instance, the online map connected to a link that was not operational, which would further limit an individual's ability to seek out services.

Through our interviews, we determined that ODJFS does not have a list of programs, services, and partners by county. This information is only collected on the Local Workforce Area level and is housed in each Memorandum of Understanding (MOU). These MOUs are inaccessible to Ohioans seeking assistance with finding work and ODJFS does not combine the data for use in developing a comprehensive list. During the audit, the programs, services, and partners for each center were collected and combined by the audit team for use in understanding statewide operations and for conducting analyses. Due to significant differences in how centers maintain and reported this data to the audit team, the

Service Accessibility

The images on the previous page highlight the disparity in information regarding services at OMJ centers. OFJFS does not collect information regarding services offered at the county level and instead relies on the information provided by individual centers.

Oftentimes individuals seeking out workforce development programs have limited resources. The services offered at OMJ centers are beneficial, in part, because they are provided at no cost to the individual. However, if the individual seeking out services must travel long distances or use limited resources, it is imperative that identifying the center that best fits the needs of the individual be easily identifiable.

time and ability to complete analyses was limited.⁸ By comparison, the United States Department of Labor maintains CareerOneStop's American Job Center Finder, which allows users to search by City, State, or ZIP Code to find the locations closest to them. The center results include the address and location, in addition to services available by participant type. Data in the AJC Finder tool is collected and maintained by the Department of Labor.

We identified peer states with similar administrative structure and Workforce Innovation and Opportunity Act state plan publishing. The websites of these 12 peer states were reviewed to identify what information was available for their OneStop centers. Like Ohio, 8 of the 12 peers have a clickable map. All peers have center contact information available. Similarly, Ohio also has information available, although it is contained in a PDF format. Five of the peer states have information regarding the categories of services offered at the center level. Ohio does not offer this information. Finally, we found that four peer states have links to virtual services that are offered, which Ohio does not provide.

⁸ A summary of the data collected is available in **Appendix B**.

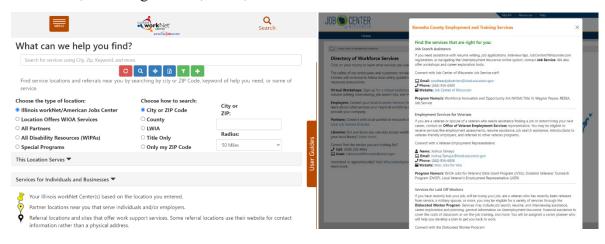
⁹ Peer states include Idaho, Indiana, Kansas, Massachusetts, Mississippi, Missouri, Montana, Nebraska, New York, Rhode Island, South Carolina, and Washington.

Peer State Website Comparison

	Clickable Map	Center Contact Information	List of Services Available	Virtual Services or Mobile Locations
Ohio	✓	✓	×	×
Idaho	×	✓	\checkmark	\checkmark
Indiana	\checkmark	\checkmark	×	×
Kansas	\checkmark	\checkmark	×	×
Massachusetts	✓	\checkmark	\checkmark	*
Mississippi	✓	\checkmark	\checkmark	*
Missouri	✓	\checkmark	×	×
Montana	✓	\checkmark	×	×
Nebraska	✓	\checkmark	×	×
New York	×	✓	×	×
Rhode Island	×	✓	×	\checkmark
South Carolina	✓	\checkmark	\checkmark	✓
Washington	×	✓	\checkmark	\checkmark

Source: Review of state websites

Additionally, other states include service and program information in their job center search tools, or allow individuals to search by the type of program or service they are seeking. For example, as seen in the images below, Illinois allows their residents to search by type of location, the resident's location, who the center serves, and by which services the center provides. Wisconsin has a county map with links to additional information about the programs and services available within the county. The pop-up includes a list of services with contact information, a description of services, and the programs that have that service. Information about the centers, including address, hours, and contact information are included at the end of the list.



Since OWD does not collect program and service information at the center-level and does not utilize CareerOneStop's free API, they cannot currently provide this information to job seeking Ohioans. Further, since the current search tools either link only to the OhioMeansJobs Center address, or to a website associated with the OhioMeansJobs center, the quality of information available varies for residents of different counties. This variance may lead to different levels of workforce development program accessibility for residents of different counties. Additionally, not having this data limits the state's ability to know what initiatives are available at the centers throughout the state, which may reduce the effectiveness of the state's planning and implementation of new programs and initiatives.

Many of the OMJ centers are housed in County Job and Family Services offices. It is likely that individuals seeking out workforce development programs may benefit from other services and programs offered at these locations. Providing a list of available resources to the public and program participants would allow individuals to maximize their efforts in seeking out assistance.

Conclusion

WIOA requires that 13 partner programs must be offered throughout a local workforce development area. All 13 programs must be offered at the comprehensive centers in an area while affiliate centers may offer a smaller selection of programs. Each local workforce area contains at least one comprehensive center. There is no centralized, searchable database that provides information on the programs offered at individual centers, which could be a barrier to individuals accessing necessary services. OWD should maintain and communicate a database of programs, partners, and services available at each OhioMeansJobs Center for use by the public which will allow Ohioans to more easily identify which OhioMeansJobs Center in their area will best suit their needs. OWD should work with OhioMeansJobs Centers to compile a list of their library partner locations to further improve accessibility for Ohioans.

Recommendation 3: Develop Additional Training

Case managers and OhioMeansJobs Center staff members are responsible for performing a variety of functions related to program and service delivery, oftentimes requiring specialized skills and training. However, there is currently limited job-specific training for these individuals available from OWD. OWD should work to develop and deploy effective training for case managers and other staff to improve their understanding of policies, procedures, and systems.

This training could be modeled off the success of the Workforce Innovation and Opportunity Act Youth/Comprehensive Case Management and Employment Program trainings, which are offered by OWD.

Background

In order to gain an understanding of operations and interactions with ODJFS, we visited a selection of OhioMeansJobs centers. The centers we visited indicated that there was a general lack of quality training for programs, initiatives, and systems. However, trainings for Workforce Innovation and Opportunity Act Youth/Comprehensive Case Management and Employment Program (WIOA Youth/CCMEP) were highly regarded. WIOA Adult and Dislocated Worker technical staff were reassigned for the implementation of the ARIES case management system. ¹⁰

Methodology

In addition to visiting a selection of OMJ centers, we conducted follow-up interviews with another group of centers and areas to obtain additional viewpoints. We used documentation to understand the relationship and governing structure between ODJFS, the Local Workforce Governing Boards, and OMJ centers. We discussed communication practices with the Office of Workforce Development and Ohio Workforce Association and reviewed the available resources on the ODJFS website.

Analysis

The CCMEP Career Coach Resources were widely regarded as exceptional during interviews with OMJ center staff. Conversely, many OMJ center staff expressed that they would like similar resources for the WIOA Adult and Dislocated Worker programs, systems, and state initiatives. Part of this difference can be attributed to the WIOA Adult and Dislocated Worker technical staff being temporary reassigned during the implementation of a new case management system.

To gain a better understanding of and quantify the differences in resources and training offered to staff within different programs, we compared the resources available on the Youth/CCMEP

¹⁰ Advancement through Resources, Information and Employment Services (ARIES) is the new WIOA and CCMEP case management system to replace the Ohio Workforce Case Management System (OWCMS) and was implemented in early 2022.

webpage to the Adult and Dislocated Worker webpage. While several resource types were identified for both programs, WIOA Youth/CCMEP resources were generally more extensive in both the level of detail and breadth of topics. Adult and Dislocated Worker resources for policies are solely those included in JFS eManuals, while Youth/CCMEP also has a webpage with individual policy links relevant to the program. The systems training for Adult and Dislocated Worker programs is limited to webinar recordings, while Youth/CCMEP also includes links to updates and technical guidance.

Program Resource Comparison

	Youth/CCMEP Career Coach Resources Webpage	Adult and Dislocated Worker Webpage
Marketing Resources	✓	×
Training Modules	✓	✓
Webinars	✓	✓
Newsletters	✓	×
Q&A	✓	×
Systems Training	\checkmark	✓
State Policies for Program	✓	✓
Federal Policies	✓	✓

Source: Review of ODJFS website

Since there are some differing program elements across the WIOA Youth, Adult, and Dislocated Worker programs, caseworkers for Adult and Dislocated Workers have expressed interest in having more thorough trainings modeled after WIOA Youth/CCMEP trainings. OMJ center staff not associated with WIOA Youth/CCMEP have been attending those trainings for guidance. With the WIOA Adult and Dislocated Worker technical staff's temporary reassignment to the case management system ending, this preference should be taken into consideration.

According to Effective Case Management: Key Elements and Practices from the Field, "Even highly-skilled case managers can benefit from specific, ongoing training and staff development activities to improve his or her performance and to hone the skills and qualities that foster supportive, productive relationships with customers. For example, case managers should receive training when workforce program policy changes, or in administering and interpreting a new assessment tool."

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Conclusion

Through our interviews, we identified that there is a lack of training on policies, procedures, and systems available to case managers at OMJ Centers. OWD should develop and provide additional program and systems training for case managers and OhioMeansJobs center staff that is modeled off the success of the WIOA Youth/CCMEP trainings to improve understanding of policies, procedures, and systems.

During the course of the audit, ODJFS began implementing additional training resources such as a training calendar, additional ways for training requests and feedback to be submitted, and meeting which allow for question and answer sessions on technical issues and other WIOA related hot topics.

Recommendation 4: Improve Communication Between Members of Ohio's Workforce System

The structure of workforce development in Ohio and the shared responsibility for program administration by both ODJFS and Local Areas requires communication both between ODJFS and Areas and amongst the Areas themselves. Currently, there is no formalized platform for regular communication that ensures consistent messaging and level of access of information. ODJFS should work to develop communications methods that allow for regular collaboration and sharing of information at all levels of workforce development management. In doing so, the Department will allow for the sharing of best practices and innovative ideas at the OMJ center level and also ensure that opinions and viewpoints are heard and acknowledged.

Background

Our interviews with OhioMeansJobs center staff, Local Workforce Development Boards, and OWD staff indicated instances of limited communication. During the course of the audit, we did not find any indication that OWD was facilitating communication between centers or areas, and we determined that there was no formal mechanism or process in place for OWD to solicit information or feedback from centers regarding changes that the Office might be making. In particular, we were made aware of concerns regarding the OhioMeansJobs.com redesign and the implementation of the new case management system, ARIES.

Methodology

In order to gain an understanding of operations and interactions with ODJFS, and how the Department determines the success of their offerings, we visited and interviewed a selection of OhioMeansJobs centers. In addition to these visits, we conducted follow-up interviews with another group of centers and areas to obtain additional viewpoints. We used documentation to understand the relationship and governing structure between ODJFS, the Local Workforce Governing Boards, and OMJ centers. We also discussed communication practices with the Office of Workforce Development and Ohio Workforce Association.

Analysis

Workforce development is a collaborative process between OWD, Local Workforce Development Boards, and OMJ center staff. One aspect of effective collaboration is communication between parties to share best practices, innovative ideas, or lessons learned. This type of communication is important amongst all interested parties. The three layers of workforce development are each stakeholders of each other and can provide valuable insight and feedback regarding operational decisions.

ODJFS Communication

OWD primarily communicates with Local Workforce Development Boards and not with individual centers. Because of this, the Office cannot confirm what information is filtered to OMJ center staff. Additionally, there is no mechanism for OMJ center staff to submit feedback or opinions regarding programmatic or systems changes.

According to Stakeholder Engagement and Consultation in Technical Writing Essentials, "Listening to stakeholder feedback and concerns can be helpful in identifying and mitigating risks that could otherwise slow down or even derail a project. For stakeholders, the consultation process creates an opportunity to be informed, as well as to inform the company about local contexts that may not be obvious, to raise issues and concerns, and to help shape the objectives and outcomes of the project."

Center staff, particularly case managers, are critical stakeholders for OWD, as they are the end users of many of the systems operated by the Office. For example, many of our interviewees pointed to a lack of communication regarding the new case management software. The current communication strategy, which limits OWD's interaction with OMJ center staff, could lead to reduced compliance rates, distrust in ODJFS/OWD, and unmitigated risks. ODJFS/OWD recognizes there is an issue with the communication being shared with centers, and during the course of the audit implemented a new communication strategy to attempt to address the issue. These improved efforts from OWD will help to ensure that the voice of the customer and center staff, is heard to improve the overall effectiveness of future changes.

Collaboration Opportunities

There are currently no ODJFS-owned resources for workforce system collaboration outside of informal work groups and steering committees. These informal groups include specific individuals, such as fiscal officers, and have historically been used by ODJFS to communicate information down to the centers or Areas. The groups typically do not involve collaborative efforts or discussion of the on-going activity of individual centers.

Rather than seeking out ODJFS-owned or sponsored collaborative opportunities, some centers and Areas have opted to leverage existing connections to share ideas and resources. Often these instances of collaboration are based in relationships that have developed over years of experience. This type of collaboration is beneficial to those involved, but the benefits and expertise that is shared by a small group of centers could be leveraged by ODJFS for greater efficiencies across the state.

Several interviewees expressed that those new to working within the workforce system faced a steep learning curve, and that some of the most valuable resources were the connections made with other workforce system professionals during one's career. Given that much of the collaboration within the state is being done outside of ODJFS's purview or systems, there is a higher risk of knowledge loss with staff turnover. With a centralized resource to facilitate and

document promising practices and collaborative idea-sharing, ODJFS may be able to reduce this risk of loss, reduce duplicated efforts, and lessen the learning curve for individuals joining new positions the workforce system. This centralized resource could be a formal knowledge sharing platform such as SharePoint or Microsoft Teams, as identified by OWD for a potential future communications strategy, or an online repository on the ODJFS website.

The need for improved collaborative resources was acknowledged by both the Ohio Workforce Association, a 501(c)(3) organization consisting of those working within Ohio's workforce system, and ODJFS. Efforts are in progress by both groups to address this need. The Ohio Workforce Association created a group for operators to share best practices and advice. The Office of Workforce Development is in the process of identifying potential tools like Microsoft SharePoint or Teams to post communications. As ODJFS continues to research and implement new communication strategies, *Managing Organizational Communication by Society* for Human Resource Management discusses the impact of effective and ineffective communication, how to build an effective communication strategy, the various constituencies affected by communicated information, measuring results, how to select the appropriate audience for each type of message, and examples of the types of communication methods used in organizations.

In addition to tools that may assist in improved communication and collaboration, the state can use WIOA funding. According to *State Sector Strategies for Talent Pipeline Systems* published in *Volume III of Investing in America's Workforce*, "One of the important tools available to governors under WIOA is each governor's 15 percent set-aside funding. These funds can be used strategically in a variety of ways to scale up the formation of industry sector partnerships...States can also use the funds to identify best practices and share them across regions."

Conclusion

Communication and collaboration among the various stakeholders in this system are keys to providing effective, efficient programs and services to Ohioans. These stakeholders include OWD, Local Workforce Development Boards, OMJ Center operators, and OMJ Center program staff. Soliciting feedback from the users of systems and individuals responsible for the implementation of programs is an important step in ensuring that the needs of the user are being met and collaboration between centers and areas can assist in developing and sharing best practices related to program delivery. Currently, there is limited sharing of information between areas outside of informal working groups. OWD should develop a formalized feedback system that actively solicits input about potential programmatic or systems changes from key stakeholders and provide centralized resources for OhioMeansJobs Centers and Local Workforce Development Areas to collaborate and share innovative ideas, which will provide centers and areas ideas to improve the efficiency and effectiveness of their operations while allowing OWD to establish best practices where appropriate.

Recommendation 5: Publish and Utilize Financial Data

Financial data, such as allocations and expenditures, for Local Areas is not collected by ODJFS in a centralized location. OWD should publish financial allocation and expenditure data by workforce program and Local Workforce Area to aid in oversight and strategic planning of Ohio's workforce programs. Additionally, ODJFS should utilize this data, coupled with the federally required performance measures, to evaluate the effectiveness of programs (see Recommendation 6). Publishing what funding is received and how much is spent will allow for greater oversight of Ohio's Workforce System, which could lead to increased efficiencies in the distribution and use of workforce funds and improved transparency.

Background

There are six primary performance measures required to be tracked under WIOA. Four of these performance measures indicate the outcomes of program participants after they exit a program, the fifth measures the progress of program participants while they are enrolled in the program, and the sixth measures outcomes of services to employers. These performance measures include:

- 1. Employment Rate 2nd Quarter After Exit
- 2. Employment Rate 4th Quarter After Exit¹¹
- 3. Median Earnings 2nd Quarter After Exit¹²
- 4. Credential Attainment¹³
- 5. Measurable Skill Gains 14
- 6. Effectiveness in Serving Employers¹⁵

The first step to establishing levels of performance in these metrics is for Ohio to create *expected levels of performance* using historical performance information, data from the Bureau of Labor Statistics, or data from the U.S. Census Bureau. These *expected levels of performance* are submitted to the USDOL for negotiation of two program years at a time.

The negotiation process considers expected levels of performance submitted by other states, the promotion of continuous improvement, the impact on the state's Government Performance and Results Act of 1993 expectations, and the use of a Statistical Adjustment Model (SAM). The USDOL SAM factors in state-specific characteristics, economic conditions, and participant characteristics to provide an objective resource during the negotiation process. Once Ohio and

¹¹ The Employment Rate performance measures includes employment or education for WIOA Youth participants only.

¹² Median earnings only measures earnings for participants who are employed.

¹³ Credential Attainment captures all recognized credentials that anyone enrolled in education or training earned during participation and up to one year after exit from a program.

¹⁴ Measurable Skill Gains indicates progress in education or training.

¹⁵ Effectiveness in Serving Employers is currently in a pilot stage while USDOL finalizes the indicator. Ohio must utilize two USDOL approaches and the Governor may establish a third State-specific approach.

USDOL agree, the performance standards are referred to as the *negotiated levels of performance*. Once Ohio establishes statewide negotiated levels of performance with USDOL, it utilizes the same negotiation process to establish negotiated levels of performance with each Local Workforce Area.

After every two program years, the USDOL adjusts the *negotiated levels of performance* for each state using economic conditions and participant characteristics within the Statistical Adjustment Model. This process creates the *adjustment factor*, which are used with the state's *actual level of performance* and *negotiated level of performance* to determine whether a state's programs performed successfully or failed.



If performance failure occurs, USDOL and ODJFS will work to develop a performance improvement plan and USDOL will provide technical assistance. If Ohio has the same performance failure occur in two consecutive program years, the USDOL will reduce the Governor's discretionary funds by five percent of the maximum allotment percentage that could be reserved by the Governor in the following program year. This sanction will be enforced each year in which the state continues to have the same performance failure. Additional sanctions are enacted if a state fails to report performance. Due to the recent enactment of WIOA and baseline performance being established, performance success and failure determinations have been delayed for several of the performance measures.

Program Years for Initial Performance Determination

		First Program Year for which Performance Success or Failure
Group	Performance Measure	Can Be Determined
Title I	Employment 2nd Quarter after Exit	PY 2020
	Median Earnings 2nd Quarter after Exit	
	Measurable Skill Gains	
	Employment 4th Quarter after Exit	
Title I	Credential Attainment	PY2022
Title III	Employment 2nd Quarter after Exit	PY2020
	Median Earnings 2nd Quarter after Exit	
Title III	Employment 4th Quarter after Exit	PY2022

Source: USDOL Negotiations and Sanctions Guidance for the Workforce Innovation and Opportunity Act (WIOA) Core Programs

Similarly, Ohio's Local Workforce Areas are also held accountable by Ohio for their performance based on adjusted levels of performance and failure thresholds established during the negotiation process. If a Local Workforce Area fails to meet performance standards in any program year, technical assistance must be provided by the State. If the local area fails to meet performance requirements for the same primary indicators of performance for a third consecutive program year, the State must take corrective actions through the development of a reorganization plan.

Local Workforce Area Sanctions

Technical Assistance Options	Corrective Action Options
Development of a performance improvement plan	The appointment and certification of a new local workforce development board
Development of a modified local or regional plan	Prohibits the use of eligible providers and OhioMeansJobs center partners that have been identified as achieving poor levels of performance
Other actions designed to assist the local area in improving performance.	Other significant actions as the State determines appropriate

Source: ODJFS WIOA Policy Letter No. 17-02

To date, neither Ohio nor its Local Workforce Areas have received sanctions for a failure to report data or a failure to meet performance ¹⁶. In addition to the required reporting to the USDOL, ODJFS publishes quarterly reports on its website that include actual performance for each Local Workforce Area's five program participant metrics.

Reports published on the ODJFS website do not include information beyond what is required to be tracked under WIOA. Additionally, ODJFS does not track information about program success or the associated costs beyond these requirements.

Ohio previously included combined Workforce Innovation and Opportunity Act Financial Allocations by Local Workforce Area and fiscal year in their Workforce Success Measures Dashboard. This website's goal was to, "help those who manage Ohio's workforce systems identify more effective and efficient ways to help Ohioans find and keep jobs." Neither Ohio's new Career Resource Navigator website nor their PDF Workforce Innovation and Opportunity Act Performance Reports include allocation or other financial data.

¹⁶ Historical negotiated performance measures are in <u>Appendix B</u>.

Methodology

We worked with the Office of Workforce Development to find how they determine success of their offerings and discussed performance evaluation with select Local Area leadership. We then visited a selection of centers to gain an understanding of operations and how they determine success of their offerings. Finally, we reviewed Ohio's and peer state's published performance reports and we reviewed Ohio's current and previously published workforce performance dashboards for content and data sources.

Analysis

At least 11 of the 12 peer states publish some form of workforce system performance on a state website. We found that Ohio surpasses most peers by providing Workforce Innovation and Opportunity Act performance data in PDF format on both a quarterly and annual basis. Ohio also surpasses most peers by providing primary workforce program data in a dashboard that is interactive and displays data older than one year. However, unlike most peers, neither Ohio's performance PDFs nor Dashboard includes information about allocations and expenditures and therefore does not evaluate the cost effectiveness of services offered through programs.

Our analysis showed that 8 of the 11 peer states with workforce system performance reporting published on their state's website include some form of allocation or expenditure data in the reporting. This financial data ranges from statewide expenditures by program and service to cost per participant by program and service received.

Additionally, within Ohio, two local areas we interviewed include financial data in internal performance reporting. Area 7/Greater Ohio Workforce Board, Inc. (GOWBI) sends all counties within the Local Workforce Area a monthly snapshot report which includes details including whether the center is passing or failing each WIOA performance measure and allocations, expenditures, and expenditure rate for WIOA programs. Area 5 maintains a balanced scorecard which includes a Return on Investment performance measure which calculates how long it takes for a "taxpayer" payback of WIOA expenditures.

Since Ohio's current workforce program success publications do not contain any allocation or expenditure information, program administrators and policy makers are limited in the ways they can evaluate and compare workforce performance in the state.

Conclusion

Understanding financial data, such as revenues and expenditures is one way in which an organization can improve strategic planning efforts. Currently, OWD does not publish financial related data when reporting on the performance of workforce development programs. OWD should publish budget allocation and expenditure data by workforce program and Local Workforce Area to improve transparency of workforce programs.

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Financial data, along with detailed performance metrics, will allow for greater oversight of Ohio's Workforce System. This information can be used to develop data-based strategic planning documents. Part of this strategic plan could be guided by the evaluation of specific efforts related to career services and training that are provided through programs administered by the Department. Information regarding services received and participant outcomes are tracked separately by the Department and are not used to evaluate programmatic outcomes. If the Department were to begin to do so, it could determine the effectiveness of specific services in order to inform decisions regarding programmatic improvements.

Recommendation 6: Consider Expanded Data Sharing

The Department receives wage data on a quarterly basis from Ohio employers for purposes of administering the Unemployment Insurance Program. This data is shared with local workforce development areas for specific and limited purposes related to case management. While existing data sharing agreements do not allow for additional uses of this data, OWD should consider reporting aggregated data related to wages and case management to areas for purposes of improved strategic planning efforts. Combining this information with allocation and expenditure data would allow for evaluation of programmatic effectiveness (see **Recommendation 5**).

Background

Wage records are submitted to ODJFS on a quarterly basis by all employers that participate in the unemployment insurance program. Each of the 20 Areas have a data sharing agreement with the Department for this data so that wage information can be matched with case management and used for performance reporting that is required by WIOA.

Based on a variety of legal requirements at the state and federal level, the wage information provided by ODJFS to the local areas can be used only for WIOA performance reporting purposes. While areas are limited in how wage data may be used, ODJFS has the ability to use it for additional purposes. Unemployment Insurance Wage Record data is currently used to populate employment outcomes for workforce programs in the Career Resource Navigator dashboard, which is published online by the Ohio Education Research Center¹⁷ in partnership with ODJFS and other state agencies. ¹⁸ This dashboard provides information that is geared towards individuals who are seeking information regarding career opportunities.

Methodology

We worked with the Office of Workforce Development to find how they determine success of their program offerings and discussed performance evaluation with select leaders from local workforce development areas. Further, we visited a selection of centers to gain an understanding of operations and how they determine success of their offerings, including barriers to determining success. Lastly, we reviewed Ohio's current and previously published workforce performance dashboards for content and data sources.

¹⁷ The Ohio Education Research Center is a unit of the John Glenn College of Public Affairs at The Ohio State University and is responsible for conducting research into educational and career programming.

¹⁸ This partnership is Ohio Analytics, an administrative data association that supports education and workforce research by utilizing a single data repository, the Ohio Longitudinal Data Archive (OLDA).

Due to the nature of the data and the potential for privacy concerns, we also consulted with legal experts to determine the feasibility of any data sharing or reporting related to the unemployment wage data.

Analysis

Access to wage data is limited due to the confidential information it contains. Based on the data sharing agreements, not only is access to this data limited, the way in which it may be used is very specifically and narrowly defined and may only be used for purposes of providing WIOA required performance reporting.

Wage data has the potential to provide valuable information to local workforce development areas regarding the success of programmatic efforts. If an area were able to tie wage records to case management data over longer periods of time, it might be able to identify trends associated with program participation. Using this information, alongside allocation and expenditure data, programmatic effectiveness could be evaluated (see Recommendation 5). According to *Data Science in the Public Interest: Improving Government Performance in the Workforce*, "These wage record data are universal and come directly from firms, meaning they are the single most important source of data on employment outcomes." Without access to this data or access to matched aggregations of this data, Local Workforce Areas and OhioMeansJobs Center staff have to collect information manually if they want to have data beyond matches available from the Data Sharing Agreement for strategic planning efforts.

The Harvard Kennedy School's Seven Delivery Practices to Achieve Better Results for High-Need Jobseekers at WIOA Career Centers published in 2020 acknowledges the benefits of using wage data stating:

"By regularly matching high-need jobseekers to state-administered Unemployment Insurance wage record data, workforce boards can better understand key outcomes for these clients and implement new changes to service delivery. In addition, breaking analysis out by key characteristics—such as educational attainment, age, race, length of unemployment, veteran status, disability status, etc.—will provide boards with a more nuanced understanding of these outcomes from which to inform service changes."

Data Matching

The local workforce development areas currently match wage record data with information contained in their case management systems for WIOA performance reporting. This is the only allowable use of wage data by the local workforce development areas based on the data sharing agreements. However, as previously stated, ODJFS may use this information for additional purposes. Further, ODJFS has the ability to pull case management data directly from the local workforce development areas and match it at the state level.

The Department already contributes to a website that reports aggregated wage data that has been matched with information by business sector. This website is focused on the job seeker and does not provide the longitudinal trends specific to a labor market that would be useful to the local workforce development areas for purposes of strategic planning, including program planning and offering adjustments. However, the Department could alter the current reporting to meet the needs of local area leadership.

Conclusion

The ability to match wage data maintained by ODJFS with case management data maintained by the local workforce development areas would allow for improved strategic planning. Combining this information with allocation and expenditure data would allow for evaluation of programmatic effectiveness. The benefits and insights gained from understanding wage trends have been documented and would allow for improved decision-making regarding program administration. ODJFS should evaluate the potential costs and benefits of reporting aggregated results of matches from Unemployment Insurance Wage Records to all programs reported in the Participant Individual Record Layout administered by the Department to Local Workforce Areas and OhioMeansJobs Centers. In this evaluation, The Department should consider how these reports could include enough detail to inform strategic planning efforts while maintaining strong standards for confidentiality. Whenever possible, the effectiveness of these services should be evaluated with consideration given to participant and OhioMeansJobs Center traits. When developing potential methodology, OWD should leverage existing data sources wherever possible to reduce the cost and effort required to produce reports.

Recommendation 7: Improve the Collection and Use of OMJ.com Data

OMJ.com is an online job board sponsored and operated by ODJFS that provides career development resources along with job postings. The state board, which includes the Department, is required by law to track and report a variety of performance metrics related to the website and its use. However, certain data is not available and therefore not provided to ODJFS by its vendor, limiting the Department's ability to remain in compliance with state law. The state board and the Department should evaluate the data that is currently being tracked on OMJ.com and evaluate what information is necessary to effectively evaluate the success of the online job board. In doing so, the Department will be able to better assist individuals who are using the tools and resources available on OMJ.com to seek out employment opportunities.

Background

OhioMeansJobs.com (referred to as OMJ.com) was launched in 2009, and since that time has provided an online portal for many of the services that are also available at county OMJ centers. The website provides services to both job providers and job seekers and is in the process of a modernization effort that will improve the user experience. OMJ.com offers a variety of services categorized into Profile, for K-12 students, or the Job Board. The Profile features services related to training, practice, and assessment of users while the Job Board offers resume hosting, job searching, and the ability to apply for jobs.

While anyone may create an OMJ.com profile and utilize the available resources, Ohio law requires that all participants in Unemployment Insurance, as well as participants in the OMJ center system must register with OMJ.com, with limited exceptions.¹⁹

Methodology

In order to understand the purpose of the job board, we discussed the background and details of OMJ.com regarding their data management practices. We also requested and received the key performance indicators and available reports from OMJ.com. Using this information, we conducted a comparison of what data is requested as outlined in the Request for Proposal against what is currently provided by the Department's vendor. To understand potential changes to the website we read about and discussed the Office of Workforce Transformation's multi-phased approach to update the website.

Additionally, we attempted to review and determine the quality of the data that is available through OMJ.com. This would include a review of existing resume data to identify how often they are updated or removed and what protocols are in place regarding data cleaning. Data

¹⁹ ORC § 4141.29 includes exceptions to this rule, those with visual impairments or language barriers.

cleaning refers to the preparation of data for analysis by removing data that does not belong in a dataset and is an important step to ensure that data analyses are meaningful.

Impact

Providing local workforce development areas additional data may allow them to evaluate the long-term impact of a variety of programmatic efforts. This can allow the Area leadership to develop strategic goals and plans in order to meet the needs of the local workforce and labor market.

Analysis

ORC § 6301.17 requires the state board to comprehensively review the performance of the OhioMeansJobs.com website and prepare a report including at least the number of referrals, job placements displayed on the website, resumes displayed on the website that were aggregated from other websites, and jobs posted to the website. However, the website is unable to track job placements at this time, which indicates that it is not in compliance with existing state law. According to the current RFP, the vendor that hosts OMJ.com is supposed to track and report 61 different data points. However, we determined that of these elements, only 28 were being provided.

Individuals who create a profile on OMJ.com provide a significant amount of personal information including education level, location, salary expectations, and work history. Additionally, most individuals upload or create a resume as a part of the online profile. This information, if utilized correctly, can assist OWD in improving the job board to assist individuals who are seeking out employment opportunities.

Online job boards are an effective tool and are considered a central part of job recruiting, providing a simple and effective way to match people with careers. However, according to *Investing in American's Workforce Volume 3*, "a serious limitation of job boards is that listings can be out-of-date, leading job seekers to waste time applying for roles that have already been filled. Searching through a high volume of listings on job boards can be overwhelming and detract from time that might be better spent engaging in other job search strategies, such as networking." OWD could mitigate this issue through the use of thoughtful data analysis. For example, a review of resume data could allow the Office to conduct outreach to specific user groups based on education or previous work experience.

We requested information regarding resume data in order to conduct some of these types of analyses. Specifically, we requested a dataset that would include the average age of resumes that are currently on OMJ.com, how regularly resumes are uploaded or deleted from OMJ.com, and how a user profile is deemed to be active or inactive. The Department indicated that this information could be obtained, but that it would require months to do so. Further, we determined that, historically, resume data was not purged from the system, but the Department is making efforts to remove data that is more than five years old with a goal of ensuring that data is purged

after one year. Removing resume data that is outdated will allow for improved analysis related to the needs of both employers and their potential employees.

Other data points, such as the amount of time spent on the website, could be useful to OWD when determining what elements of OMJ.com to promote. For example, it could track data related to which services in the OMJ.com Profile are accessed most often to identify the career services that are beneficial to job seekers. Additionally, OWD could attempt to track job placements to determine the success of individuals obtaining employment through OMJ.com

As the website undergoes a redesign to make it more user friendly, OWD should consider what data elements would be most beneficial in tracking both the historic success of the job board, but also what data can be used to make strategic decisions to impact future users of OMJ.com and improve their overall experience.

Conclusion

OMJ.com is the state's job board and has a large number of users with profiles on the system. These profiles can be used to obtain valuable data beyond what is required by state law. While the website is undergoing redesign changes, the state board and the Department should reconsider how the service is used. Reevaluating the site's data needs will also assist in better defining outcomes and success for users. Any improvement to the site could help Ohioans find employment and alleviate the unemployment insurance system.

Recommendation 8: Re-evaluate Work Search Validation Process

When individuals receive unemployment insurance benefits, they are required to engage in regular work search efforts. The Department requires that, beginning in the first week, individuals filing for unemployment benefits conduct two approved active search for work activities and continue for each week they file a claim for benefits. Additionally, claimants must participate in reemployment activities by their eighth week of claiming benefits. ODJFS should reevaluate what activities qualify as a work search activity, and when these activities are required to be completed in order to maximize positive outcomes. Further, employees are required by law to accept an offer of suitable work. Beginning in June 2020, employers were able to report non-compliance with this requirement directly to ODJFS using the *Eligibility Notice/Refusal to Return to Work Form* on the Department's website. ODJFS should ensure that employers are aware of and actively using this form, when appropriate.

The Department relies on Benefits Accuracy Measurement (BAM) as a way to conduct quality control assessments on benefits that were paid in the previous year. One of the variables tracked by BAM is work search activities. It should be noted that BAM uses data from the previous year for analysis purposes and is not meant to be used for real-time data analysis purposes. ODJFS does not conduct any additional tracking or review of the validity of work search activities prior to the payment of benefits, which limits its ability to prevent fraud. While the use of BAM and lack of real-time tracking was likely the best available option for identifying overpayments due to non-compliance with the work search requirements when this process was first initiated, it is now inadequate, as indicated by the billions of dollars in benefits over payments identified during the COVID-19 pandemic,²¹ and is a weakness of internal controls. ODJFS should consider redesigning how it reviews and validates work search activities and leverage modern IT systems to identify fraudulent claims prior to payment.

Impact

Improving the oversight of work search activities will allow ODJFS to ensure that approved activities are benefiting both job seekers and employers. Further, implementing a process that proactively checks the validity of work search efforts will minimize the overpayment of unemployment benefits to those individuals who fail to meet this requirement.

²⁰ Weekly reporting requirements and some elements of timing are set by the General Assembly by ORC § 4141.29. ODJFS has discretion on the number and type of activities outside of statutory requirements.

²¹ AOS Report on Unemployment Fraud

Background

State law requires individuals who are receiving unemployment benefits to actively search for suitable work unless their former employer has indicated that the individual is part of a temporary layoff and are expected to return to work within 45 days. In Ohio, individuals who are receiving unemployment insurance benefits are required to conduct two work search activities per week from an approved list of activities. In addition to actively applying for open positions and submitting resumes to potential employers, Ohio's list of acceptable work search activities focuses heavily on OhioMeansJobs.com activities, such as training and assessments. Ohio law also states that if a recalled individual refuses to return to work, the employer must notify ODJFS. In addition, Ohio law states that individuals are not entitled to unemployment benefits if they have "refused without good cause to accept an offer of suitable work when made by an employer." ODJFS is required to investigate claims involving individuals who quit work without good cause and/or who refuse offers of work without good cause. ODJFS has an electronic form on its website that employers can complete to report eligibility notices or refusals to return to work.

Work Search Activities

Individuals receiving unemployment benefits must engage in two work search activities each week while receiving benefits. A sample of activities include:

- Applying for jobs;
- Create or maintain a reemployment plan,
- Create and maintain a searchable, active resume;
- Attend a job fair;
- Create a profile on a professional networking sight; and,
- Attend training.

This is only a sample of eligible activities. ODJFS guidance indicates that any good faith effort that is reasonably expected to result in reemployment could be considered an eligible activity.

Individuals are required to provide information regarding work search activities through the unemployment portal.²² Additionally, applicants must maintain a record of work search efforts and shall produce these records if requested. Any individual who fails to comply with this requirement may be denied unemployment benefits. While this is a requirement tied to unemployment insurance compensation, ODJFS currently has no process in place that confirms the validity of work search activities prior to payment. Instead, a sample of claims are selected for retroactive review and may require documentation.

Methodology

We reviewed the work search requirements associated with unemployment insurance compensation in Ohio and compared it to peer states and national best practices.

²² Exclusions may apply in accordance with ORC § 4141.29(A)(4)(b)(iii).

Analysis

Work search requirements are required for individuals receiving unemployment benefits. Nationally, individuals are required to perform an average of 3 work search activities each week. Ohioans are required to complete 2 work search activities each week and maintain an active,

searchable resume on OhioMeansJobs.com by week 8 of unemployment. Ohio also requires claimants to complete the Career Profile on OhioMeansJobs.com by week 20. In addition to Ohio, 20 states require individuals register with their state job board and an additional 18 states encourage the use of the state job board. Work search requirements can be a tool to prevent fraudulent unemployment benefit claims.

The Department does not actively check the validity of work search activities prior to payment. So, for example, an individual can claim that he or she applied for a job at a company, but ODJFS does not determine if the job opening exists unless the claim is selected to be reviewed as a part of Benefits Accuracy Measurement (BAM). Additionally, the Department does not confirm if the company is even legitimate. This leaves ODJFS open to abuse of the unemployment system by individuals that do not make a good faith effort to seek reemployment.

In 2021, the Auditor of State issued two reports that focused on the unemployment insurance system. The first, a performance audit, indicated that the IT systems used by ODJFS to administer benefits are outdated and required significant updates. The second, a public interest report, indicated that in 2021 alone

Non-Compliance Reporting

In addition to participating in weekly work search activities, individuals receiving unemployment insurance benefits must be willing to accept any offer of suitable employment.

Employers can submit referrals directly to ODJFS regarding individuals who may be refusing offers of suitable work. The inquiry form, which is accessible here, is used to collect information regarding the individual that is used by ODJFS case managers to conduct an investigation into the employer's claim.

If an individual receiving unemployment insurance benefits is found to refuse an employment offer without good cause, he or she may have future unemployment insurance benefits denied. Further, depending on the intent of the refusal, the individual may be subject to a fraud finding and be required to repay benefits to the state.

the Department paid nearly \$475 million in fraudulent benefits claims and more than \$3.2 billion in overpayments to individuals.

While the Department does not actively confirm the validity of work search activities prior to payment, it does measure the accuracy of unemployment benefit payments. ODJFS currently follows the BAM that is published by the USDOL and included in the ET Handbook No.395 5th edition. BAM is a quality control statistical survey used to identify errors and support corrective action in the state's unemployment insurance system. For claims that were improperly paid or denied, BAM determines the cause of and the party responsible for the error, the point in the UI claims process at which the error was detected, and actions taken by the claimant, employer, and agency prior to sample selection.

We reviewed a four-year period of BAM data which identified overpayments by cause. This data is based on a sample of claims that are reviewed. It is important to understand that not all claims have errors, and the overpayments represent only a portion of the total sample. However, as seen in the table below, work search errors were a much higher cause of overpayments on a percentage basis in Ohio compared to the national average.

% of Dollars Paid by Cause 2019-2022 4 Year Average

	Ohio 4 Year Average	National 4 Year Average	Ohio Above/(Below) National Average
Able & Available	0.25%	0.98%	(0.73%)
Base Period Wage Issue	0.30%	0.27%	0.03%
Benefit Year Earnings	3.08%	4.07%	(0.99%)
Dependents Allowance	0.02%	0.02%	(0.00%)
ES Registration	0.00%	0.29%	(0.29%)
Other Eligibility	1.30%	1.61%	(0.31%)
Other Issues	0.07%	0.41%	(0.34%)
Separation Issues	1.42%	3.66%	(2.23%)
Ser./Vac./SSI/Pension	0.41%	0.31%	0.10%
Work Search	4.14%	2.47%	1.66%

Source: USDOL

Ohio does not have measures in place that are preventing false work search activities to be recorded prior to it being spot checked by BAM. This results in the potential for increased overpayments of unemployment benefits. We found that other states are doing some additional cross referencing using other available data sources. For example, the Department may be able to partner with the Ohio Department of Taxation or the Ohio Secretary of State's Office to obtain a current list of registered business locations to confirm the validity of addresses. The Department could consider measures taken by other states. For example, in Colorado, there is a cross checking system which monitors 19 measures and flags potential fraud, and in Montana the Department of Labor and Industry has partnered with the Montana Board of Realty Regulation and Montana Association of Realtors to become aware of claimants using old business addresses or properties for sale on applications.

State law requires that suitable work²³ refusals require a good cause²⁴ in order to not disqualify an individual for unemployment benefits. Additionally, ORC § 4141.28(F) requires that ODJFS has an eligibility notice form available for employers to use to report work refusals. Employers can notify ODJFS using the *Eligibility Notice/Refusal to Return to Work Form*. A claims specialist conducts an investigation to determine if the refusal was for good cause. Between March 15, 2020 and January 31, 2023, there were a total of 16,463 work refusals related to COVID-19 and an additional 19,026 refused offers of work issues reported. Of the 16,463 work refusals, 772, or 4.7 percent were appealed, 83.8 percent were allowed or cleared, and 16.2 percent were deferred, disallowed, or are still open. Of the 19,026 refused offers of work issues, 2,139, or 11.2 percent were appealed, 74.5 percent were allowed or cleared, and 25.5 percent were deferred, disallowed, or are still open. These results show that the majority of work refusals reported to ODJFS between March 2020 and January 2023 were accepted.

Conclusion

While work search requirements can be a beneficial tool in preventing fraud in the unemployment system and encouraging individuals to make a good faith effort to seek reemployment, if they are not monitored in a meaningful way, it is possible to abuse the system. Ohio should evaluate what constitutes a reemployment requirement and when it is required to be completed in order to maximize the success of these activities. Ohio does not have measures in place that are preventing false work search activities to be recorded prior to it being spot checked by BAM. This results in more overpayments by work search cause.

²³ "Suitable work" is appropr

²³ "Suitable work" is appropriate employment for the individual, taking into consideration such things as the individual's age, education level, work experience and physical fitness for work. Suitability of work is established based upon conditions including, but not limited to, the following: 1. Prior Training and Work Experience – The work is in line with what the individual was doing or was trained to do. There is a strong presumption that if the work the individual previously performed was suitable, it is suitable when offered again. 2. Wages and Benefits – A review of the total pay and benefit package to determine if it is substantially similar to the previously performed work. 3. Travel Distance – Whether the distance to the job is within the customary commuting pattern for the applicant's occupation and the area of residence. 4.Shift and Hours – The shift of hours offered is characteristic of the occupation in the locality offered. 5. Health and Physical Fitness – Whether the individual is physically able to perform the job. 6.Health and Safety – Whether the health and safety precautions recommended during the COVID-19 transition are being followed.

²⁴ Pursuant to the Governor's Executive Order Number 2020-24D, during COVID-19, "good cause" for refusing suitable work can include any one of the following: 1.A medical professional's recommendation that an individual not return to work because he/she falls into a category that is considered "high risk" for contracting COVID-19 by the Centers for Disease Control and Prevention, and the employer cannot offer teleworking options. 2. The employee is 65 years of age or older. 3. Tangible evidence of a health and safety violation by the employer that does not allow the employee to practice social distancing, hygiene and wearing protective equipment. 4. Potential exposure to COVID-19 and a prescribed quarantine imposed by a medical or health professional. 5. Staying home to care for a family member who is suffering from COVID-19 or subject to a prescribed quarantine imposed by a medical or health professional. The state of emergency during Covid-19 was ended by Executive Order 2021-08D, signed June 18, 2021.

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Ohio Performance Team

ODJFS should ensure that employers are aware of and actively using the *Eligibility Notice/Refusal to Return to Work Form*, when appropriate. Ohio should also determine if the number of work search activities, the types of work search activities, the timing of completion of work search activities, and methods of verifying work search activities are accurate, that are currently in place are the best options to maximize work search success.

Recommendation 9: Ensure Security of Confidential Personal Information

ODJFS requires that individuals who receive unemployment compensation benefits create an account with OhioMeansJobs.com. This website is operated independently from the unemployment compensation system and necessitates a secondary log-in. As a part of enrollment into OhioMeansJobs.com, several emails are sent to the individual, and these emails may contain confidential personal information. The Department should evaluate the IT security controls and processes in place related to unemployment compensation account set-up and OhioMeansJobs.com registration to help ensure personally identifiable information is being protected from unauthorized use and that protocols used to facilitate the registration process with OhioMeansJobs.com are secure and limit the amount of personal information being communicated via email or other unsecure modes of transportation.

Impact

Information Technology (IT)/cyber security is the practice of defending IT systems, servers, networks and data from threats and malicious attacks. IT/cyber security covers a broad range of topics including, but not limited to, network security, application security, operational security, and awareness training. Entities must take steps to ensure their IT systems, infrastructure, and data are protected both logically and physically from loss, corruption or malicious attacks. Ensuring the security of user information will help to instill public trust in the programs and system administered by ODJFS related to unemployment insurance and workforce development.

Background

Individuals may apply for unemployment compensation using an online portal. As part of the application process various emails are sent to applicants to verify enrolment. These emails contain various types of information about the applicant including name, address, and contact information. As discussed in Recommendation 8, individuals that obtain unemployment benefits are required to create an OMJ.com user profile. When an unemployment account is set-up, an OMJ.com account is automatically created. The emails used to process an unemployment compensation application are also used to provide an initial password for OMJ.com which partly consists of the last four digits of the applicant's social security number (SSN). The SSN would be information that was entered during the unemployment compensation application process. However, OMJ.com and the unemployment compensation system do not interface with each other, meaning that OMJ.com cannot pull information directly from the unemployment compensation system.

Methodology

We conducted interviews with IT staff at ODJFS and reviewed third party cyber security analyses that were conducted on behalf the Department. We then compared the information we found to industry best practices regarding the security of personal information.

Analysis

ODJFS has adopted and follows policies and procedures related to IT and cyber-security. The Department follows the Enterprise controls framework in the Department of Administrative Services (DAS) ITS-SEC-02 Enterprise Security Controls Framework. This state IT standard specifies the minimum requirements for information security in all agencies and identifies the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 (Revision 4), "Security and Privacy Controls for Federal Information Systems and Organizations," as the framework for information security controls implementation.

The Department has adopted a hybrid approach between NIST 800-53 and the NIST Cyber Security Framework (CSF). For all major line of business applications they follow the NIST 800-53 controls framework and document them in the System Security Plan. Both the unemployment compensation system (Eric/OJI) and Ohio Means Jobs application (OMJ) have a system security plan in place. For all minor supporting applications the Department completes a Security Impact Assessment (SIA) based on the NIST CSF.

Security Testing

The Department has contracted for and undergone an independent third-party cyber-security review. JFS contracted with the Ohio National Guard Cyber Forces (ONGCF) to conduct a penetration test to identify and exploit vulnerabilities an attacker could use to gain unauthorized access to ODJFS information systems, or to impact the integrity and availability of systems and applications. The penetration test included the following attack vectors:

- External Network Testing
- Internal Network Testing
- Web Application Testing
- Wireless Network Testing

The report from the ONGCF penetration test dated September 27, 2021 assessed the overall Security Risk Rating of ODJFS. There were no imminent exploitation vectors identified that put user data directly at risk. Any potential risk factors identified were formally communicated to ODJFS by the ONGCF.

The Department responded to the testing report with a formal Corrective Action Plan (CAP) detailing specifics actions to be taken to remediate the findings identified in the ONGCF penetration testing report. In addition, ODJFS has signed a Rules of Engagement Document with the Department of Homeland Security Cybersecurity and Infrastructure Security Agency (CISA) to perform a penetration test.

If critical IT security controls are not in place, there is an elevated risk that the Agency's Information systems, infrastructure, and data, including customer information, could be compromised, or misused by unauthorized individuals.

Conclusion

The Department has taken steps to identify potential IT security threats and is taking further steps to mitigate issues that have been identified. ODJFS should evaluate the IT security controls and processes in place related to unemployment compensation account setup and OMJ.com registration to help ensure personally identifiable information is being protected from unauthorized use and that protocols used to facilitate the registration process are secure and limit the amount of personally identifiable information being communicated via email or other unsecure modes of transmission.

Client Response Letter

Audit standards and AOS policy allow clients to provide a written response to an audit. The letter on the following pages is the Department's official statement in regards to this performance audit. Throughout the audit process, staff met with Department officials to ensure substantial agreement on the factual information presented in the report. When the Department disagreed with information contained in the report, and provided supporting documentation, revisions were made to the audit report.

Efficient

Effective

Transparent

Mike DeWine, Governor Jon Husted, Lt. Governor

Matt Damschroder, Director

February 10, 2023

The Honorable Keith Faber Auditor of State 88 East Broad Street, 5th Floor Columbus, Ohio 43215

Auditor Faber:

On behalf of the Ohio Department of Job and Family Services (ODJFS), I would like to thank you and your audit team for the work in conducting the reemployment services performance audit. The audit team was professional, detailed, and quickly learned the complex world of workforce development, including local workforce development areas (local areas), OhioMeansJobs centers, and reemployment services. Their work has provided us with useful recommendations to improve our workforce development system and enhance the customer experience for all Ohioans seeking reemployment assistance.

The key observations and recommendations in the report were thorough, and we appreciate the focus on improvement and accessibility. We will evaluate the following recommendations as we seek to improve our workforce delivery system and reemployment services:

- 1. Evaluate how to improve service delivery within Ohio's local workforce development areas (local areas).
- 2. Take inventory of services available in Ohio's 88 OhioMeansJobs centers and determine how to present this information on the Office's website as well as on OhioMeansJobs.com.
- 3. Continue to increase the development and deployment of training for case managers working in the OhioMeansJobs centers to improve their understanding of policies, procedures, and systems and to obtain specialized skills.
- 4. Work with appropriate entities to develop a process to effectively communicate with the OhioMeansJobs centers.
- 5. Explore ways to provide information that promotes the ability of the Office of Workforce Development (OWD) and local workforce areas to provide oversight and to strategically plan for Ohio's workforce programs. Through this process, OWD will examine data collected from various resources in the Office, including OhioMeansJobs.com.

30 East Broad Street Columbus, OH 43215 jfs.ohio.gov 6. Analyze and explore the potential impact of making changes to unemployment work search requirements, including but not limited to adding required work search activities and auditing such work search activities.

ODJFS is committed to exploring ways to improve the workforce service delivery to Ohioans and ensure that the staff in the OhioMeansJobs center are skilled, knowledgeable, and have the information to do their jobs. ODJFS will also explore how to gather the necessary data, ensuring access to those data meet standard controls, to assist in making decisions, and to demonstrate the effectiveness of the services provided through our programs.

Sincerely,

Matt Damschroder Director

waterlie

30 East Broad Street Columbus, OH 43215 ifs.ohio.gov

Appendix A: Purpose, Methodology, Scope, and Objectives of the Audit

Performance Audit Purpose and Overview

Performance audits provide objective analysis to assist management and those charged with governance and oversight to improve program performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.

Generally accepted government auditing standards (GAGAS) require that a performance audit be planned and performed so as to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on audit objectives. Objectives are what the audit is intended to accomplish and can be thought of as questions about the program that the auditors seek to answer based on evidence obtained and assessed against criteria.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Scope and Objectives

In order to provide the Department with appropriate, data driven, recommendations, the following questions were assessed within each of the agreed upon scope areas:

Summary of Objectives and Conclusions

Objective	Recommendation
Programs and Office of Workforce Development	
What opportunities exist for ODJFS to improve the programs that get unemployed individuals back to work?	R.1, R.2, R.3, R.4. R.5, and R.6
OhioMeansJobs.com	
What opportunities exist to improve OhioMeansJobs.com as it relates to re-employment of individuals?	R.7
Work Search Requirements	

What opportunities exist to improve efficiency and effectiveness of ODJFS work search requirements?	R.8
Cyber Security	
What opportunities exist to improve cyber security practices related to UI?*	R.9

Note: Based on constituent complaints related to this process, a review of cyber security practices was completed as a component of this audit.

Although assessment of internal controls was not specifically an objective of this performance audit, internal controls were considered and evaluated when applicable to scope areas and objectives. The following internal control components and underlying principles were relevant to our audit objectives:²⁵

- Control environment
 - We assessed the Department's exercise of oversight responsibilities in regards to unemployment benefits administration and WIOA data submissions.
- Risk Assessment
 - We considered the Department's activities to assess fraud risks.
- Information and Communication
 - We considered the Department's use of quality information in relation to its financial, Workforce Development activities, and systems data.
- Control Activities
 - We considered the Department's compliance with applicable laws and contracts.

We noted an internal control weakness in **Recommendation 8**.

Audit Methodology

To complete this performance audit, auditors gathered data, conducted interviews with numerous individuals associated with the areas of Department's operations included in the audit scope, and reviewed and assessed available information. Assessments were performed using criteria from a number of sources, including:

- Peer States;
- Industry Standards;
- Leading Practices;
- Statues; and,
- Policies and Procedures.

²⁵We relied upon standards for internal controls obtained from *Standards for Internal Control in the Federal Government* (2014), the U.S. Government Accountability Office, report GAO-14-704G.

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We selected states that consolidate Workforce Innovation and Opportunity Act Title I and Title III under the same administrating department and submitted a Combined Workforce Innovation Opportunity Act state plan to form the peer group for comparisons contained in this report. These peers are identified as necessary and appropriate within the section where they were used. These states include:

- Idaho
- Indiana
- Kansas
- Massachusetts
- Mississippi
- Missouri
- Montana
- Nebraska
- New York
- Rhode Island
- South Carolina
- Washington

Appendix B: Programs and Office of Workforce Development

Workforce Delivery System

As discussed in <u>Recommendation 1</u>, ODJFS attempted to deny the certification of Area 7 under WIOA. This decision was appealed to the USDOL. The letter on the following page was sent to the Ottawa Board of Commissioners and ODJFS from the USDOL, which upheld the appeal. The result of this decision by the USDOL required that ODJFS solely use criteria explicitly stated in WIOA, which resulted in Area 7 continuing to exist in its current configuration.

Efficient

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U.S. Department of Labor

Employment and Training Administration 200 Constitution Avenue, N.W. Washington, D.C. 20210



FEB 1 7 2016

Steven M. Arndt 315 Madison Street, Room 103 Port Clinton, OH 43452

Dear Commissioner Arndt:

The U.S. Department of Labor, Employment and Training Administration (ETA) received an appeal on September 24, 2015 from the Ottawa Board of Commissioners regarding the State of Ohio's decision to deny the request from Ohio Local Area 7 for designation as a local workforce development area under the Workforce Innovation and Opportunity Act (WIOA).

In your appeal, you stated that you believed you were denied due process in your request for designation as a local area under WIOA because the State evaluated the request for designation using criteria beyond that enumerated at WIOA 106(b)(2). Specifically, the State denied the request based on the following rationale:

- Local Area 7 purportedly has low expenditure rate of allotted funds compared to other local areas in the State;
- The local area is too large to manage effectively, compromising 43 of Ohio's 88
 counties:
- The non-contiguous nature of the local area (as well as its size) compromises the State's regional planning efforts;
- The composition of the local area into eleven sub-areas distorts the overall financial management and performance data of Local Area 7 as a whole; and
- When taken individually, some of the individual sub-areas would not meet the definition of 'performed successfully'.

Scope of USDOL Review

Section 106(b)(5) of WIOA permits a unit of general local government (including a combination of such units) or grant recipient that requests but is not granted designation as a local area under WIOA section 106(b)(2) or (3) to submit an appeal to the State Board under an appeal process in accordance with Training and Employment Guidance Letter (TEGL) 27-14: Workforce Innovation and Opportunity Act Transition Authority for Immediate Implementation of Governance Provisions. If the appeal does not result in such a designation, the Secretary of Labor may require that the area be designated as a local area under the appropriate paragraph if that the area meets the requirements of WIOA section 106(b)(2) or (3),

Determination

The Department has considered the evidence and has determined that:

- (1) States may not use criteria beyond those explicitly stated at WIOA Section 106(b)(2) to evaluate requests for initial designation. The statute does not address geographic continuity as a requirement of local areas.
- (2) The State's local area designation policy is out of compliance with WIOA and TEGL No. 27-04. The policy improperly applied the local area designation criteria for new local areas for local areas applying for designation instead of the criteria at WIOA Section 106(b)(2) for existing WIA local areas that wish to continue their designation under WIOA. Specifically, the State incorrectly applied the criteria at WIOA Section 106(b)(1) and denied the request on the grounds that the local area is inconsistent with labor market areas in the area and is inconsistent with regional economic development areas in the State.
- (3) The local area designation policy incorrectly defines 'performed successfully' as meeting or exceeding all performance measures for the two year period prior to the enactment of WIOA. For the purpose of initial local area designation, the term "performed successfully" means that the local area met or exceeded the levels of performance the Governor negotiated with the Local Board and chief elected official, and the local area has not failed any individual measure for the last two consecutive program years before the enactment of WIOA. The terms "met or exceeded" and "failure" must be defined by the Governor in the State's policy consistent with how those terms were defined at the time the performance levels were negotiated. When designating local areas, the Governor may not retroactively apply any higher WIOA threshold to performance negotiated and achieved under WIA.

Therefore, the Department does not uphold the State's decision to reject Local Area 7's request for initial designation. In addition, the Department declines to exercise its authority to "require that the area be designated as a local area under the appropriate paragraph if that the area meets the requirements of WIOA section 106(b)(2) or (3)" and requires the State to:

- (1) Review Local Area 7's request for initial designation based exclusively on the criteria at WIOA Section 106(b)(2).
- (2) Bring the State's local area designation policy into compliance with TEGL 27-14, specifically the definition of "performed successfully"; and
- (3) Provide adequate time for the State Board to review and approve revised local area designation policy and post for public comment.

This letter constitutes the Department's determination action on your appeal. The Department is concurrently sending a copy of this letter of determination to the relevant

Auditor of State Ohio Performance Team

State representatives. The Department encourages the Local Area to work with the State to determine if Local Area 7's large size and non-contiguous nature negatively impact regional planning and service delivery and whether reorganization of the local area may better meet the needs of Ohio job seekers and businesses.

Sincerely,

Portia Wu

Assistant Secretary

cc: Cynthia Dungey, Director, Ohio Department of Job and Family Services Christine Quinn, Regional Administrator, ETA Chicago Regional Office Carl Stahlheber, Federal Project Officer for Ohio, ETA Chicago Regional Office Each Local Area has at least one comprehensive center that offers all WIOA programs and services in one location. As a part of our analyses, we examined the proximity of these comprehensive centers to Ohioans. Under WIOA, the goal is for workforce development to be a local effort. However, under the current structure of Ohio's Local Areas, the proximity of these comprehensive centers to residents of any given area can vary greatly. The following tables include a summary of the analysis completed to evaluate comprehensive center accessibility, as referenced in **Recommendation 1** of the report.

Access to Comprehensive Centers: Non-Area 7

				Closest Comprehensive	
Area	County	Address	City	Center	Distance
1	Adams	19221 State Route 136	Winchester	Portsmouth	49.4
1	Brown	406 W. Plum St.	Georgetown	Portsmouth	58.0
1	Pike	941 Market St.	Piketon	Portsmouth	26.0
1	Scioto	433 Third St.	Portsmouth	Portsmouth	24.7
2	Medina	72 Public Square	Medina	Akron	26.2
2	Summit	1040 E. Tallmadge Avenue	Akron	Akron	20.7
3	Cuyahoga	1910 Carnegie Avenue	Cleveland	Cleveland	19.2
4	Lorain	42495 North Ridge Rd.	Elyria	Elyria	24.2
5	Lake	177 Main Street	Painesville	Painesville	16.3
6	Stark	822 30th St.	Canton	Canton	21.3
6	Tuscarawas	1260 Monroe St.	New Philadelphia	Canton	28.7
8	Auglaize	13093 Infirmary Rd.	Wapakoneta	Celina	21.8
8	Hardin	175 W. Franklin St.	Kenton	Celina	54.7
8	Mercer	220 W Livingston St.	Celina	Celina	19.8
8	Van Wert	114 E. Main St.	Van Wert	Celina	22.1
9	Lucas	1301 Monroe St.	Toledo	Toledo	26.0
10	Crawford	225 E. Mary St.	Bucyrus	Mansfield	28.1
10	Richland	183 Park Ave. East	Mansfield	Mansfield	19.9
11	Franklin	1111 E. Broad St.	Columbus	Columbus	16.3
12	Butler	4631 Dixie Highway	Fairfield	Fairfield	17.9
12	Warren	300 E. Silver St.	Lebanon	Fairfield	23.2
12	Clermont	2400 Clermont Center Dr.	Batavia	Fairfield	35.3
13	Hamilton	1916 Central Parkway	Cincinnati	Cincinnati	20.6
14	Perry	212 S. Main St.	New Lexington	Athens	34.7
14	Athens	510 W Union Street	Athens	Athens	28.9
14	Meigs	175 Race St.	Middlepot	Athens	27.9
15	Morgan	155 E. Main St.	McConnelsville	Marietta	30.5
15	Noble	46049 Marietta Rd.	Caldwell	Marietta	28.7
15	Monroe	100 Home Ave.	Woodsfield	Marietta	45.6
15	Washington	1115 Gilman Avenue	Marietta	Marietta	31.3
16	Carroll	55 E. Main St.	Carrollton	Steubenville	34.9
16	Harrison	520 N. Main St.	Cadiz	Martins Ferry	24.4
16	Jefferson	114 N. Fourth St.	Steubenville	Steubenville	19.6

16	Belmont	302 Walnut St.	Martins Ferry	Martins Ferry	38.3
17	Mahoning	127 Boardman-Canfield Rd.	Boardman	Lisbon	19.6
17	Columbiana	7989 Dickey Dr.	Lisbon	Lisbon	18.3
18	Trumbull	280 N. Park Ave.	Warren	Warren	20.4
19	Ashtabula	2247 Lake Ave.	Ashtabula	Ashtabula	29.7
19	Geauga	12480 Ravenwood Dr.	Chardon	Ashtabula	41.2
19	Portage	253 South Chestnut Street	Ravenna	Ashtabula	65.2
20	Pickaway	1005 S. Pickaway St.	Circleville	Lancaster	21.0
20	Ross	475 Western Avenue	Chillicothe	Lancaster	37.7
20	Fairfield	239 W. Main St.	Lancaster	Lancaster	17.2
20	Hocking	389 W. Front St.	Logan	Lancaster	18.2
20	Vinton	30975 Industrial Park Drive	McArthur	Lancaster	39.7

Access to Comprehensive Centers: Area 7

C 4	A 11	C''	Closest Comprehensive	D' /
County	Address	City	Center	Distance
Allen	951 Commerce Parkway	Lima	Allen	19.5
Ashland	15 W. Fourth St.	Ashland	Knox	39.1
Champaign	1512 South U.S. Hwy. 68	Urbana	Allen	52.9
Clark	1345 Lagonda Ave.	Springfield	Allen	68.8
Clinton	1025 S. South St.	Wilmington	Allen	98.3
Coshocton	725 Pine St.	Coshocton	Knox	36.2
Darke	603 Wagner Ave.	Greenville	Allen	61.8
Defiance	1300 E. Second St.	Defiance	Allen	49.2
Delaware	140 N. Sandusky St. 2nd FL	Delaware	Knox	36.7
Erie	221 W. Parish St.	Sandusky	Knox	82.7
Fayette	107 E. East St.	Washington Court House	Knox	90.9
Fulton	604 S. Shoop Ave.	Wauseon	Allen	63.9
Gallia	848 Third Avenue	Gallipolis	Knox	136.0
Greene	581 Ledbetter Rd.	Xenia	Allen	81.1
Guernsey	324 Highland Ave.	Cambridge	Knox	66.1
Hancock	7746 CR 140	Findlay	Allen	37.7
Henry	104 E. Washington St.	Napoleon	Allen	53.3
Highland	1575 N. High St.	Hillsboro	Knox	114.0
Holmes	85 N. Grant St.	Millersburg	Knox	36.7
Huron	185 Shady Lane Dr.	Norwalk	Knox	66.2
Knox	17604 Coshocton Rd.	Mount Vernon	Knox	17.6
Jackson	25 E. South St.	Jackson	Knox	111.0
Lawrence	120 N. 3rd St.	Ironton	Knox	148.0
Licking	998 E. Main St.	Newark	Knox	29.1
Logan	1 Hunter Place	Bellefontaine	Allen	33.6
Madison	200 Midway St.	London	Allen	77.4

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Marion	622 Leader St.	Marion	Knox	45.0
Miami	2040 N. County Road 25A	Troy	Allen	47.0
Montgomery	1111 S. Edwin C. Moses Blvd.	Dayton	Allen	72.4
Morrow	619 W. Marion Rd.	Mt. Gilead	Knox	27.5
Muskingum	445 Woodlawn Avenue	Zanesville	Knox	46.3
Ottawa	8043 W. State Route 163	Oak Harbor	Allen	94.0
Paulding	250 Dooley Dr.	Paulding	Allen	53.8
Preble	1500 Park Ave.	Eaton	Allen	87.0
Putnam	575 Ottawa-Glendorf Rd. Ste. 1	Ottawa	Allen	25.2
Sandusky	2511 Countryside Dr.	Fremont	Allen	81.4
Seneca	900 E. County Rd. 20	Tiffin	Allen	64.9
Shelby	227 S. Ohio Avenue	Sidney	Allen	31.4
Union	940 London Avenue	Marysville	Knox	54.3
Wayne	356 W. North St.	Wooster	Knox	40.3
Williams	1425 E. High St.	Bryan	Allen	67.6
Wood	1928 E. Gypsy Lane Road	Bowling Green	Allen	58.8
Wyandot	120 E. Johnson St.	Upper Sandusky	Knox	61.4

Programs & Services

The following tables include service names and definitions for the three types of services available at OhioMeansJobs Centers, as referenced in **Recommendation 2**. These service names and definitions were gathered through attachments from Local Workforce Area Memorandum of Understanding attachments. Services available vary by OhioMeansJobs Center location. The tables are divided into Basic Career Services, Individual Services, and Business Services.

Basic Career Services Available at Select OhioMeansJobs Centers

BCS#	Service Name	Service Definition
1	Eligibility Determination	Comparison of information from an individual job seeker with eligibility criteria established for programs and services offered through the local workforce development system.
2	Outreach, Intake, and Orientation	Outreach involves the collection, publication, and distribution of information on program services available through the local workforce development system. Intake involves the collection of basic job seeker information for eligibility determination. Orientation involves sharing information on the available programs and services with job seekers, which may be done in a group setting, one-on-one, or electronically through OhioMeansJobs.com.
3	Initial Assessment	Collect information to determine each job seeker's skill levels, aptitudes, abilities, barriers, and supportive service needs.
4	Labor Exchange Services	Provide job search and placement assistance, which includes, at a minimum, providing information on and, as needed, assistance with registration and use of the OhioMeansJobs.com system. As needed, provide career counseling that includes instruction on how to locate information on in-demand occupations and industries and nontraditional employment in the OhioMeansJobs.com system.
5	Referrals	Includes referrals to and coordination of partner programs and services offered through the workforce development system, and may also include referrals to other workforce development programs when appropriate.
6	Labor Market Information	Provide information for job seekers on workforce and labor market employment statistics that include local, regional, and national job vacancy listings, local in-demand occupations, and the skills needed for the vacant jobs and in-demand occupations
7	Provider Performance and Program Cost Information	Collect and provide information on eligible training services providers by program and type of provider
8	Local Performance Information	Provide information in useable and understandable formats and languages on local area performance in comparison with local performance accountability measures.

9	Supportive Services	Provide information in useable and understandable formats and languages on the availability of supportive services or assistance and provide referrals and assistance as appropriate, which may include: child care; child support; Medicaid or Children's Health Insurance Program; SNAP benefits; earned income tax credit, TANF assistance; transportation; and other supportive services.
10	Unemployment Compensation Claim	Provide information on and meaningful assistance with filing claims for Unemployment Compensation benefits, which may be on-site or via telephone or other technology as long as the assistance is provided by well-trained staff within a reasonable time.
11	Eligibility Assistance	Provide guidance to individuals who aren't eligible for WIOA on eligibility for financial aid assistance to complete other training and education programs that aren't provided under WIOA

Individual Services Available at Select OhioMeansJobs Centers

ICS#	Service Name	Service Definition
1	Comprehensive and Specialized Assessments	A closer look at the skills levels and service needs that may include: a. Diagnostic Testing and use of other assessment tools; and b. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
2	Individual Employment Plan	Work with the job-seeker to identify employment goals and objectives and develop an individualized plan to achieve those goals. Include information about eligible training providers
3	Group Counseling	
4	Individual Counseling	
5	Career Planning	
6	Short-Term Prevocational Services	May include development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training.
7	Internships/Work Experience	Coordination of eligible job seekers and employers for planned and structured learning experiences that take place in the workplace and are linked to careers
8	Workforce Preparation Activities	
9	Financial Literacy Services	Services to enhance an individual's ability to: create household budgets; initiate savings plans; make informed financial decisions; manage spending, credit, and debt; increase awareness on the availability and significance of credit reports; to understand, evaluate, and compare

		financial products, services, and opportunities; and to address the particular financial literacy needs of non-English speakers.
10	Out-of-Area Job Search Assistance and Relocation Assistance	
11	English Language Acquisition and Integrated Education and Training Programs	

Business Services Available at Select OhioMeansJobs Centers

BS#	Service Name	Service Definition
1	Employer Development, Planning, and Referral Services	Resources and services to help employers with marketing, consulting, networking, referral, and public relations efforts. This service also includes succession planning, such as executive transition, aging workforce organizational movement, or employer ownership.
2	Workforce Retention	Analyzing causes and offer suggestions to reduce worker turnover and/or aim at keeping existing employers in the community. This includes activities which focus on employee growth and further performance
3	Employer Needs Assessment	Assistance to employers in managing their business needs
4	Job Order Assistance	Activities provided to help businesses post job openings on OhioMeansJobs.com or through business service assistance available through the OhioMeansJobs center.
5	Participation in Job Fair	An employer's participation in other workforce events, outside a job or career fair, which is hosted by the OhioMeansJobs center.
6	Participation in Workforce Special Events	An employer's participation in other workforce events, outside a job or career fair, which is hosted by the OhioMeansJobs center.
7	Outreach Activities and Assistance	Provision of promotional activities generated on behalf of the employer to help recruit candidates for open positions and hiring events utilizing social media, media promotion, and electronic websites. This service includes workforce acquisition, which is the seeking of specific worker types and/or attracting new workers
8	Veteran Employer Contact	Information gathering activities pertaining to identifying employers seeking to hire veterans
9	Screening Assistance for Employers	Assistance to employers in processing employment applications for hiring needs (collect, review, and submit to employer). Proctoring pre-employment applicant assessments for groups or individuals as part of the screening assistance for employers. The process of

		searching and/or accessing, screening, and referring a job seeker's resume to an employer seeking talent. Communication with the employer to determine if an individual has been hired
10	Workforce Incentives	Provision of information regarding: • Incentives available to employers (e.g., WOTC, SYP, Minority, Veterans, other) Various types of incentives, such as export/import programs, green programs (reuse, recycling, and green efforts), tax abatements, operating capital incentives, technology incentives, etc.
11	On-the-Job Training	Recruitment of employers who wish to participate in a training conducted by the employer who receives that is provided to a paid participant while engaged in productive work in a job.
12	Customized Training	Training that is designed to meet the specific requirements of an employer or group of employers; is conducted with the commitment by the employer to employ an individual upon successful completion of the training; and for which the employer pays a portion of the cost of the training
13	Incumbent Worker Training	Seeking training to develop and enhance incumbent worker skills
14	Skills Enhancement	Training that assists employees in learning specific knowledge or skills to improve performance in their current roles
15	Internships	Seeking interns or internship information
16	Apprenticeships/Youth Apprenticeship	Referral and information (via apprentice.ohio.gov) regarding programs that teach high-level skills by providing individuals structured on-the-job training and related technical instruction.
17	Job Shadowing	Short-term unpaid activities which introduces a participant to the workplace and provides exposure to occupational areas of interest to increase career awareness
18	Transitional Jobs	A subsidized work experience that is time-limited and designed to assist individuals to establish a work history, demonstrate success in the workplace, and develop skills that lead to entry into and retention in unsubsidized employment
19	Work Experience	A planned, structured learning experience that takes place in a workplace for a limited time.
20	Workplace/Industry Tours	Visiting an employer's facility, as part of a career awareness activity for students and/or job seekers.
21	Mentoring	Matching a participant with an employer or employee of a company to build a working relationship with the participant and to develop necessary skills.

22	Provision of Labor Market Information	The provision of labor market information, including, but not limited to, the following: • Affirmative Action Statistics • Regional and County Economic Information (employment, census, poverty levels, talent availability) • Economic Trends and Forecasts • Education and Training Outcomes • Job and Industry Growth Patterns • Non-Proprietary Employer Information • Occupational Descriptions • Population and Demographic Information • Skill Standards • Wage Levels for Various Occupations
23	Access to Services to Avoid Layoff	Strategies (e.g., SharedWork Ohio) that prevents and/or minimizes unemployment for employees of companies that have either announced layoffs; or are struggling and at risk of downsizing. This service also includes services provided to local businesses aimed at keeping the existing business in the community
24	Mass Layoff and Plant Closure Assistance	Activities provided in the case of a permanent closure or mass layoff at a plant, facility, or enterprise, or a natural disaster, that results in mass job dislocation, to assist dislocated workers in obtaining reemployment as soon as possible.
25	WARN (Worker Adjustment Retraining Notification) Assistance	Activities provided to at-risk employers outlining the requirements of advanced notification of plant closings and mass layoffs
26	Employment Laws and Regulations	This service does not involve the provision of legal advice or legal counsel but does include the following: • Assistance to employers to provide information and assist with UI laws and regulations • Activities provided to employers providing guidance on federal, state, and local employment laws and practices, including OSHA and EPA issues • Employee handbook needs, drug-free workplace assistance, healthcare information, etc. • Provision of translation services
27	Ex-Offender Bonding Information and Assistance	Information provided to employers regarding employment of ex-offenders.
28	Development of Career Pathways and Industry Sector Partnerships	Provision of information on the development of career pathways for a particular employer, group of employers, or an industry sector.

29	Received OhioMeansJobs center orientation	An activity provided to introduce employers to the OhioMeansJobs center and the partners and services available to businesses through the center
30	Website Demonstration	Activities that provide guidance on how to navigate and use OhioMeansJobs.com.

The following tables include information about the services offered at each OMJ Center. This data was reported by the OMJ Centers and collected from MOUs where available. Due to the significant effort required to collect and aggregate this data, the audit team was unable to conduct further analyses. Each column of the tables represents the service as defined by the tables above in the appendix. The figures in each row represent the count of partners at each OMJ Center that offer the service listed.

Basic Career Services from All Partners Offered by County

	S 1	S 2	83	S 4	S	9 S	S 7	×	6 S	BCS 10	BCS 11	Te
County	BCS	BCS	BCS	BCS	BCS	BCS	BCS	BCS	BCS	BC	BÇ	Total
Allen	18	20	20	16	19	17	17	15	19	2	13	176
Ashland	3	3	3	3	3	3	2	2	3	3	2	30
Belmont	4	4	3	3	4	4	4	4	4	1	4	39
Butler	8	10	10	10	10	10	7	9	9	6	9	98
Carroll	3	3	3	3	3	3	3	3	3		3	30
Champaign	3	3	3	3	3	3	2	2	3	3	3	31
Clark	6	11	8	8	13	7	6	5	7	6	6	83
Clermont	7	8	8	8	8	8	6	7	8	5	7	80
Clinton	4	5	5	5	5	5	3	3	5	5	3	48
Coshocton	8	8	8	8	8	8	8	8	8	8	8	88
Crawford	3	3	3	3	3	3	2	2	3	2	2	29
Cuyahoga	6	8	9	9	9	8	5	5	6	3	5	73
Darke	13	13	12	13	13	12	4	4	6	4	10	104
Defiance	3	4	4	4	4	4	4	4	4	4	4	43
Delaware	6	6	6	6	6	6	4	4	2	6	5	57
Erie	7	9	10	8	9	7	4	4	4	4	7	73
Fairfield	4	4	4	4	4	4	1	2	3	1	2	33
Fayette	4	8	8	6	8	6	2	2	6	6	2	58
Franklin	15	10	16	2	16	12	3	7	7	2	4	94
Fulton	1	2	2	4	4	2	2	3	4	4	1	29
Gallia	1	3	2	2	1	3	1	1	1	2	2	19
Greene	10	12	12	10	12	11	6	6	10	10	2	101
Guernsey	5	5	6	6	6	6	3	3	5	6	2	53
Hamilton	12	10	10	10	5	10	2	6	13	3	2	83
Hancock	8	12	10	11	10	9	2	2	8	4	7	83
Harrison	3	3	2	2	3	3	3	3	3	1	3	29

Henry	6	7	7	8	8	7	2	5	8	9	5	72
Highland	12	19	15	7	19	8	6	6	11	6	7	116
Hocking	4	4	4	4	4	4	2	3	3	1	3	36
Holmes	4	4	4	4	4	4	2	2	4	4	2	38
Huron	1	1	1	1	1	1	1	1	1	1	1	11
Jackson	7	4	4	4	4	4	2		4	3	2	38
Jefferson	4	4	2	2	4	4	4	3	4	2	4	37
Knox	9	9	9	8	8	7	3	1	8	4	2	68
Lawrence	3	5	5	3	10	5	2	2	4	3	4	46
Licking	7	6	6	6	6	7	4	5	6	6	4	63
Logan	4	6	6	4	4	4	4	4	4	4	4	48
Lorain	8	8	8	7	11	8	4	6	5	4	4	73
Lucas	8	7	8	7	7	7	1		6	4	6	61
Madison	2	4	4	2	2	2	2	2	2	2	2	26
Marion	9	8	8	5	9	5	6	6	7	6	9	78
Medina	2	2	3	3	3	3	2		2	2	2	24
Miami	6	6	7	4	6	4	2	1	6	2	4	48
Monroe	2	2	2	1	2	1	1	1	1	1	1	15
Montgomery					-	•	services	not speci	ified			
Morgan	3	3	3	2	3	2	1	1	1	1	2	22
Morrow	7	8	8	7	8	7	5	5	7	6	7	75
Muskingum	4	4	4	4	4	4	4	4	4	4	4	44
Noble	4	4	4	2	4	2					2	22
Ottawa	6	6	6	5	5	5	5	5	5	4	4	56
Paulding	2	2	2	2	2	2	2	2	2	2	1	21
Pickaway	4	4	4	4	4	4	1	2	3	1	3	34
Preble	15	15	15	15	15	15	15	15	15	15	15	165
Putnam	6	6	6	6	5	6	3	2	4	6	4	54
Ross	4	4	4	4	5	4	2	3	3	1	3	37
Sandusky	9	9	9	9	8	8	4	4	9	5	6	80
Seneca	8	8	8	8	8	8	5	4	8	8	7	80
Shelby	5	5	7	6	4	4	3	2 3	3	2	4	45
Stark	9	10	10	4	10	7	5	3	10	2	4	74
Summit Trumbull	2 3	3 6	3 7	3 2	8	3 5	2	3	4 8	2 2	4	34 52
Tuscarawas	6	8	8	3	8	4	1 4	3	8	2	3	52 57
Union	4	4	4	4	4	4	2	1	3	4	3	37
Vinton	4	4	4	4	4	4	2	3	3	1	3	36
Warren	7	10	10	8	10	8	7	7	9	6	7	89
Washington	3	3	3	2	4	2	1	1	1	1	2	23
Wayne	4	12	10	9	14	10	4	3	4	3	5	78
Williams	6	7	8	8	9	7	5	3	9	4	7	73
Wood	8	8	8	7	8	7	5	1	7	4	6	69
Wyandot	9	9	9	9	8	8	3	2	5	8	5	75
Total	405	455	454	384	472	399	247	243	375	259	301	3,994
IUIAI	403	433	134	J04	7/4	377	24/	443	313	239	301	3,774

Individual Career Services from All Partners Offered by County

	ICS 1	ICS 2	ICS 3	ICS 4	ICS 5	ICS 6	ICS 7	ICS 8	ICS 9	ICS 10	ICS 11	Total
County												
Allen	18	14	14	14	14	16	9	14	14	11	5	143
Ashland	3	3	3	3	3	3	3	3	3	3	3	33
Belmont	6	4	2	2	7	4	6	7	2		1	41
Butler	10	10	7	8	11	11	9	11	10	8	9	104
Carroll	4	4	1	1	4	1	4	4	1		1	25
Champaign	4	4	3	4	4	4	2	2	3	3	2	35
Clark	10	7	9	7	9	9	6	9	6	6	5	83
Clermont	8	9	6	7	9	9	8	9	8	7	7	87
Clinton	5	5	4	4	5	5	2	4	4	5	2	45
Coshocton Crawford	8	8	8 2	8	8	8 2	8 2	8	8 2	8	8	88 24
	10	10	3	5	9	9	7	9	7	1	2	73
Cuyahoga Darke	11	7	8	8	9	9	6	10	6	6	3	83
Darke Defiance	3	4	0	0	3	4	3	3	3	O	3	23
Delaware	5	6	2	6	6	5	4	1	3			35
Erie	8	8	5	7	10	6	5	7	6	1	1	64
Fairfield	4	3	3	3	4	3	1	2	2	1	1	23
Fayette	7	6	7	6	7	6	2	2	6	6	3	58
Franklin	12	8	9	17	9	10	9	16	3	1	5	99
Fulton	3	4	2	4	2	3		10	J	-	J	18
Gallia	4	2	2	2	3	3	1	4	2	2	1	26
Greene	11	11	5	12	12	10	6	9	7	3	1	87
Guernsey	5	5	4	5	6	3	3	6	3	3	3	46
Hamilton	9	14	10	7	8	5	2	7	3	1		66
Hancock	10	10	4	8	8	8	8	8	5	4	1	74
Harrison	3	2	1	1	3	2	2	2				16
Henry	7	9	1	7	6	5	1	4	4	4		48
Highland	8	9	9	10	13	7	6	9	8	14	10	103
Hocking	5	4		4	4	3	3	2	2	2	2	31
Holmes	4	4	2	4	4	2	2	4	2	2	2	32
Huron	1	1	1	1	1	1	1	1	1	1	1	11
Jackson	7	6	1	7	5	3	4	5	3	1		42
Jefferson	5	2	3	3	4	5	4	3	1		1	31
Knox	10	9		10	10	5	3	6	3	2	1	59
Lawrence	6	3	4	4	6	3	4	7	4	3	3	47
Licking	7	7	4	7	8	5	5	7	4	4	4	62
Logan	4	4	4	4	4	4	4	6	6	4	4	48
Lorain	6	6	5	5	8	9	5	9	1	4	2	60
Lucas	9	10	3	7	10	9	3	13	8	4	2	78
Madison	2	2	2	2	2	2	2	4	4	2	2	26

Marion	10	8	1	9	6	7	5	10	4	4	3	67
Medina	10	3	3	3	3	2	2	3	2	2	J	23
Miami	6	5	3	7	5	5	4	3	4	1		43
Monroe	3	3	1	3	3	3	2	3	2	1	1	25
Montgomery				Ava	ilable, s	pecific s	services	not spec	cified			
Morgan	2	2	1	2	3	3	2	3	2	1	1	22
Morrow	10	9	3	9	8	7	4	7	7	6	6	76
Muskingum	5	5	5	5	5	5	5					35
Noble	2	2		4	4	4	2	4	2			24
Ottawa	6	5	4	4	6	7	5	6	5	4	4	56
Paulding	2	2	1	1	2	2	2	2	1			15
Pickaway	5	4	2	4	4	4	1	2	2	1	2	31
Preble	15	15	13	15	15	15	13	15	15	15	15	161
Putnam	6	6	2	6	6	4	2	5	5	5		47
Ross	6	4		4	4	3	3	2	2	2	1	31
Sandusky	8	9	2	9	5	4	1	4	4	4		50
Seneca	8	8	3	7	7	6	4	7	7	7	3	67
Shelby	7	5	2	6	5	7		3	3	2	3	43
Stark	11	10	5	8	11	5	6	10	5	1	3	75
Summit	2	3	3	3	5	3	2	3	2	2	2	30
Trumbull	10	7	1	1	10	10	5	8	7	1	3	63
Tuscarawas	8	8	4	6	9	4	5	6	2	1	1	54
Union	4	4	1	4	4	4	2	4	4	4	1	36
Vinton	5	4		4	4	3	3	2	2	2	1	30
Warren	8	8	6	8	7	9	7	7	7	6	7	80
Washington	3	3	1	4	4	5	4	4	2	1	1	32
Wayne	9	6	5	6	8	6	7	11	4		1	63
Williams	8	9	2	7	8	7	4	8	7	6	2	68
Wood	8	8	1	7	8	6	4	8	6	4	1	61
Wyandot	7	7	3	8	9	7	3	4	4	4		56
Total	449	419	238	391	439	378	274	394	284	214	161	3,641

Communication

To better understand Ohio's Workforce System, OPT interviewed a selection of OhioMeansJobs Center Operators and Staff, as well as Leadership from a selection of Local Workforce Area Boards.

Centers Visited and Interviewed

Center	Date Visited
Franklin	7/6/2022
Jefferson	7/13/2022
Richland	7/18/2022
Allen	7/20/2022
Mercer	7/21/2022
Van Wert	7/21/2022
Pike	7/25/2022
Ashtabula	7/26/2022
Erie	7/27/2022
Marion	7/27/2022
Butler	7/28/2022
Coshocton	7/29/2022
Knox	7/29/2022
Highland	8/2/2022
Delaware	8/8/2022
Pickaway	8/8/2022

Local Workforce Area Boards Interviewed

Area	Counties in Area	Date Interviewed
Area 14	Athens, Meigs, Perry	8/9/2022
Area 5	Lake	8/10/2022
Area 7	Allen, Fayette, Jackson, Muskingum, Williams, Ashland, Fulton, Knox, Ottawa, Wood, Champaign, Gallia, Lawrence, Paulding, Wyandot, Clark, Greene, Erie, Licking, Preble, Clinton, Guernsey, Logan, Putnam, Coshocton, Hancock, Madison, Union, Sandusky, Darke, Henry, Marion, Seneca, Defiance, Highland, Miami, Shelby, Delaware, Holmes, Montgomery, Huron, Morrow, and Wayne	8/19/2022

Performance Evaluation and Reporting

To better understand the performance of Local Workforce Area's WIOA performance and WIOA performance statewide, we reviewed historical negotiated and actual metrics.

Ohio's Negotiated WIOA Standards - Employment Rate **2ND QUARTER AFTER EXIT**

	PY							
WIOA Group	2016	2017	2018	2019	2020	2021	2022	2023
Adult	79.0%	79.0%	79.0%	79.0%	81.5%	81.5%	76.5%	77.0%
Dislocated Worker	82.0%	82.0%	84.0%	84.0%	86.0%	86.0%	76.5%	77.0%
Youth	49.0%	49.0%	67.0%	67.0%	72.0%	72.0%	70.0%	70.0%
Wagner-Peyser	62.0%	62.0%	68.0%	68.0%	70.0%	70.0%	68.0%	68.0%

4TH QUARTER AFTER EXIT

	PY							
WIOA Group	2016	2017	2018	2019	2020	2021	2022	2023
Adult	73.0%	73.0%	76.0%	76.0%	79.5%	79.5%	73.0%	74.0%
Dislocated Worker	79.0%	79.0%	82.0%	82.0%	84.0%	84.0%	77.0%	77.0%
Youth	49.0%	49.0%	65.0%	65.0%	70.5%	70.5%	69.0%	69.5%
Wagner-Peyser	60.0%	60.0%	66.0%	66.0%	69.0%	69.0%	66.0%	66.0%

Ohio's Negotiated WIOA Standards Median Earnings 2ND QUARTER AFTER EXIT

	PY							
WIOA Group	2016	2017	2018	2019	2020	2021	2022	2023
Adult	\$5,000	\$5,000	\$5,700	\$5,700	\$5,900	\$5,900	\$6,700	\$6,700
Dislocated Worker	\$6,600	\$6,600	\$8,000	\$8,000	\$8,400	\$8,400	\$8,700	\$8,700
Youth					\$2,800	\$2,800	\$3,100	\$3,100
Wagner-Peyser	\$5,000	\$5,000	\$6,200	\$6,200	\$7,100	\$7,100	\$7,200	\$7,200

Note: Youth standards were not negotiated until PY2020.

Ohio's Negotiated WIOA Standards Credential Attainment

	PY							
WIOA Group	2016	2017	2018	2019	2020	2021	2022	2023
Adult	50.0%	50.0%	60.0%	60.0%	65.0%	65.0%	70.0%	70.0%
Dislocated Worker	58.0%	58.0%	64.0%	64.0%	69.0%	69.0%	74.0%	75.0%
Youth	49.0%	49.0%	55.0%	55.0%	50.0%	50.0%	50.0%	50.0%

Ohio's Negotiated WIOA Standards Measurable Skill Gains

WIOA Group	PY2020	PY2021	PY2022	PY2023
Adult	60.0%	60.0%	64.0%	64.0%
Dislocated Worker	60.0%	60.0%	64.0%	64.0%
Youth	37.0%	37.0%	49.0%	49.0%

Area Negotiated Standards - Adult Credential Attainment

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.50	0.85	0.85	0.85	0.85
Area 2	0.50	0.57	0.57	0.59	0.59
Area 3	0.50	0.54	0.54	0.60	0.60
Area 4	0.50	0.60	0.60	0.68	0.68
Area 5	0.50	0.73	0.73	0.75	0.75
Area 6	0.50	0.75	0.75	0.75	0.75
Area 7	0.50	0.65	0.65	0.70	0.70
Area 8	0.50	0.68	0.68	0.68	0.68
Area 9	0.50	0.70	0.70	0.72	0.72
Area 10	0.50	0.70	0.70	0.73	0.73
Area 11	0.50	0.52	0.52	0.55	0.55
Area 12	0.50	0.72	0.72	0.72	0.72
Area 13	0.50	0.70	0.70	0.70	0.70
Area 14	0.50	0.75	0.75	0.76	0.76
Area 15	0.50	0.70	0.70	0.70	0.70
Area 16	0.50	0.60	0.60	0.65	0.65
Area 17	0.50	0.72	0.72	0.74	0.74
Area 18	0.50	0.70	0.70	0.75	0.75
Area 19	0.50	0.72	0.72	0.74	0.74
Area 20	0.50	0.75	0.75	0.75	0.75

Area Negotiated Standards - Adult Employment **2ND QUARTER AFTER EXIT**

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.79	0.80	0.80	0.80	0.80
Area 2	0.79	0.79	0.79	0.82	0.82
Area 3	0.79	0.79	0.79	0.80	0.80
Area 4	0.79	0.86	0.86	0.86	0.86
Area 5	0.79	0.86	0.86	0.86	0.86
Area 6	0.79	0.85	0.85	0.85	0.85
Area 7	0.79	0.81	0.81	0.83	0.83
Area 8	0.79	0.86	0.86	0.86	0.86
Area 9	0.79	0.85	0.85	0.82	0.82
Area 10	0.79	0.79	0.79	0.79	0.79
Area 11	0.79	0.77	0.77	0.77	0.77
Area 12	0.79	0.86	0.86	0.86	0.86
Area 13	0.79	0.86	0.86	0.86	0.86
Area 14	0.79	0.79	0.79	0.79	0.79
Area 15	0.77	0.84	0.84	0.85	0.85
Area 16	0.79	0.78	0.78	0.78	0.78
Area 17	0.79	0.85	0.85	0.85	0.85
Area 18	0.79	0.84	0.84	0.85	0.85
Area 19	0.79	0.83	0.83	0.83	0.83
Area 20	0.79	0.82	0.82	0.84	0.84

Area Negotiated Standards - Adult Employment 4TH QUARTER AFTER EXIT

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.73	0.78	0.78	0.79	0.79
Area 2	0.73	0.76	0.76	0.77	0.77
Area 3	0.73	0.79	0.79	0.80	0.80
Area 4	0.73	0.81	0.81	0.81	0.81
Area 5	0.73	0.86	0.86	0.86	0.86
Area 6	0.73	0.83	0.83	0.83	0.83
Area 7	0.73	0.79	0.79	0.81	0.81
Area 8	0.73	0.85	0.85	0.85	0.85
Area 9	0.73	0.80	0.80	0.80	0.80
Area 10	0.73	0.79	0.79	0.79	0.79
Area 11	0.73	0.76	0.76	0.74	0.74

Area 12	0.73	0.84	0.84	0.84	0.84
Area 13	0.73	0.85	0.85	0.85	0.85
Area 14	0.73	0.76	0.76	0.77	0.77
Area 15	0.73	0.78	0.78	0.83	0.83
Area 16	0.73	0.76	0.76	0.76	0.76
Area 17	0.73	0.82	0.82	0.83	0.83
Area 18	0.73	0.82	0.82	0.83	0.83
Area 19	0.73	0.81	0.81	0.79	0.79
Area 20	0.73	0.78	0.78	0.80	0.80

Area Negotiated Standards - Adult Measurable Skill Gains

Area	PY20	PY21
Area 1	0.60	0.60
Area 2	0.60	0.60
Area 3	0.60	0.60
Area 4	0.65	0.65
Area 5	0.60	0.60
Area 6	0.65	0.65
Area 7	0.60	0.60
Area 8	0.57	0.57
Area 9	0.57	0.57
Area 10	0.60	0.60
Area 11	0.55	0.55
Area 12	0.60	0.60
Area 13	0.55	0.55
Area 14	0.65	0.65
Area 15	0.60	0.60
Area 16	0.55	0.55
Area 17	0.60	0.60
Area 18	0.60	0.60
Area 19	0.65	0.65
Area 20	0.60	0.60

Area Negotiated Standards - Adult Median Earnings **2ND QUARTER AFTER EXIT**

Area	PY17	PY18	PY19	PY20	PY21
Area 1	\$5,000	\$5,440	\$5,440	\$5,700	\$5,700
Area 2	\$5,000	\$5,580	\$5,580	\$5,580	\$5,580
Area 3	\$5,000	\$5,400	\$5,400	\$5,400	\$5,400
Area 4	\$5,000	\$5,800	\$5,800	\$5,800	\$5,800
Area 5	\$5,000	\$8,000	\$8,000	\$7,800	\$7,800
Area 6	\$5,000	\$6,000	\$6,000	\$6,300	\$6,300
Area 7	\$5,000	\$5,800	\$5,800	\$6,300	\$6,300
Area 8	\$5,000	\$6,500	\$6,500	\$6,800	\$6,800
Area 9	\$5,000	\$5,700	\$5,700	\$5,700	\$5,700
Area 10	\$5,000	\$5,500	\$5,500	\$5,500	\$5,500
Area 11	\$5,000	\$4,800	\$4,800	\$5,500	\$5,500
Area 12	\$5,000	\$5,700	\$5,700	\$6,200	\$6,200
Area 13	\$5,000	\$6,350	\$6,350	\$6,500	\$6,500
Area 14	\$4,000	\$4,600	\$4,600	\$5,000	\$5,000
Area 15	\$5,000	\$6,200	\$6,200	\$6,400	\$6,400
Area 16	\$5,000	\$5,100	\$5,100	\$5,900	\$5,900
Area 17	\$5,000	\$6,200	\$6,200	\$6,400	\$6,400
Area 18	\$5,000	\$6,685	\$6,685	\$6,685	\$6,685
Area 19	\$5,000	\$6,500	\$6,500	\$6,500	\$6,500
Area 20	\$5,000	\$6,000	\$6,000	\$6,000	\$6,000

Area Negotiated Standards - Dislocated Worker Credential Attainment

PY17	PY18	PY19	PY20	PY21
0.52	0.70	0.70	0.75	0.75
0.58	0.66	0.66	0.70	0.70
0.58	0.54	0.54	0.69	0.69
0.58	0.75	0.75	0.75	0.75
0.58	0.70	0.70	0.70	0.70
0.58	0.75	0.75	0.75	0.75
0.58	0.69	0.69	0.72	0.72
0.58	0.68	0.68	0.75	0.75
0.58	0.70	0.70	0.70	0.70
0.58	0.75	0.75	0.80	0.80
0.58	0.62	0.62	0.60	0.60
	0.52 0.58 0.58 0.58 0.58 0.58 0.58 0.58 0.58 0.58	0.52 0.70 0.58 0.66 0.58 0.54 0.58 0.75 0.58 0.70 0.58 0.69 0.58 0.68 0.58 0.70 0.58 0.70 0.58 0.70 0.58 0.75	0.52 0.70 0.70 0.58 0.66 0.66 0.58 0.54 0.54 0.58 0.75 0.75 0.58 0.70 0.70 0.58 0.75 0.75 0.58 0.69 0.69 0.58 0.68 0.68 0.58 0.70 0.70 0.58 0.75 0.75	0.52 0.70 0.70 0.75 0.58 0.66 0.66 0.70 0.58 0.54 0.54 0.69 0.58 0.75 0.75 0.75 0.58 0.70 0.70 0.70 0.58 0.75 0.75 0.75 0.58 0.69 0.69 0.72 0.58 0.68 0.68 0.75 0.58 0.70 0.70 0.70 0.58 0.75 0.75 0.80

Area 12	0.58	0.75	0.75	0.75	0.75
Area 13	0.58	0.73	0.73	0.75	0.75
Area 14	0.58	0.65	0.65	0.75	0.75
Area 15	0.58	0.70	0.70	0.72	0.72
Area 16	0.58	0.70	0.70	0.75	0.75
Area 17	0.58	0.72	0.72	0.75	0.75
Area 18	0.58	0.74	0.74	0.74	0.74
Area 19	0.58	0.75	0.75	0.75	0.75
Area 20	0.58	0.72	0.72	0.70	0.70

Area Negotiated Standards - Dislocated Worker Employment **2ND QUARTER AFTER EXIT**

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.82	0.82	0.82	0.85	0.85
Area 2	0.82	0.84	0.84	0.84	0.84
Area 3	0.82	0.85	0.85	0.86	0.86
Area 4	0.82	0.86	0.86	0.84	0.84
Area 5	0.82	0.86	0.86	0.86	0.86
Area 6	0.82	0.87	0.87	0.87	0.87
Area 7	0.82	0.85	0.85	0.86	0.86
Area 8	0.82	0.84	0.84	0.84	0.84
Area 9	0.82	0.82	0.82	0.82	0.82
Area 10	0.82	0.82	0.82	0.84	0.84
Area 11	0.82	0.81	0.81	0.82	0.82
Area 12	0.82	0.86	0.86	0.87	0.87
Area 13	0.82	0.86	0.86	0.86	0.86
Area 14	0.82	0.84	0.84	0.84	0.84
Area 15	0.77	0.84	0.84	0.86	0.86
Area 16	0.82	0.84	0.84	0.85	0.85
Area 17	0.82	0.82	0.82	0.84	0.84
Area 18	0.82	0.87	0.87	0.87	0.87
Area 19	0.82	0.85	0.85	0.85	0.85
Area 20	0.82	0.84	0.84	0.82	0.82

Transparent

Area Negotiated Standards - Dislocated Worker Employment 4TH QUARTER AFTER EXIT

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.79	0.80	0.80	0.83	0.83
Area 2	0.79	0.82	0.82	0.82	0.82
Area 3	0.79	0.83	0.83	0.84	0.84
Area 4	0.79	0.84	0.84	0.82	0.82
Area 5	0.79	0.86	0.86	0.86	0.86
Area 6	0.79	0.85	0.85	0.85	0.85
Area 7	0.79	0.83	0.83	0.84	0.84
Area 8	0.79	0.82	0.82	0.82	0.82
Area 9	0.79	0.79	0.79	0.79	0.79
Area 10	0.79	0.82	0.82	0.83	0.83
Area 11	0.79	0.80	0.80	0.80	0.80
Area 12	0.79	0.84	0.84	0.85	0.85
Area 13	0.79	0.84	0.84	0.84	0.84
Area 14	0.79	0.82	0.82	0.82	0.82
Area 15	0.79	0.80	0.80	0.84	0.84
Area 16	0.79	0.79	0.79	0.82	0.82
Area 17	0.79	0.80	0.80	0.82	0.82
Area 18	0.79	0.85	0.85	0.85	0.85
Area 19	0.79	0.84	0.84	0.80	0.80
Area 20	0.79	0.82	0.82	0.77	0.77

Area Negotiated Standards - Dislocated Worker Measurable Skill Gains

Area	PY20	PY21
Area 1	0.62	0.62
Area 2	0.60	0.60
Area 3	0.62	0.62
Area 4	0.65	0.65
Area 5	0.60	0.60
Area 6	0.65	0.65
Area 7	0.60	0.60
Area 8	0.60	0.60
Area 9	0.60	0.60
Area 10	0.65	0.65
Area 11	0.60	0.60

Auditor of State

Ohio Performance Team

Area 12	0.65	0.65
Area 13	0.58	0.58
Area 14	0.65	0.65
Area 15	0.60	0.60
Area 16	0.55	0.55
Area 17	0.60	0.60
Area 18	0.60	0.60
Area 19	0.65	0.65
Area 20	0.60	0.60

Area Negotiated Standards - Dislocated Worker Median Earnings **2ND QUARTER AFTER EXIT**

Area	PY17	PY18	PY19	PY20	PY21
Area 1	\$6,600	\$8,000	\$8,000	\$8,400	\$8,400
Area 2	\$6,600	\$7,760	\$7,760	\$7,760	\$7,760
Area 3	\$6,600	\$7,100	\$7,100	\$7,200	\$7,200
Area 4	\$6,600	\$8,600	\$8,600	\$8,600	\$8,600
Area 5	\$6,600	\$9,000	\$9,000	\$9,000	\$9,000
Area 6	\$6,600	\$7,000	\$7,000	\$7,000	\$7,000
Area 7	\$6,600	\$8,000	\$8,000	\$8,400	\$8,400
Area 8	\$6,600	\$7,500	\$7,500	\$8,400	\$8,400
Area 9	\$6,600	\$7,200	\$7,200	\$7,200	\$7,200
Area 10	\$6,600	\$7,400	\$7,400	\$8,400	\$8,400
Area 11	\$6,600	\$8,200	\$8,200	\$8,600	\$8,600
Area 12	\$6,600	\$9,000	\$9,000	\$9,400	\$9,400
Area 13	\$6,600	\$8,206	\$8,206	\$8,700	\$8,700
Area 14	\$6,400	\$6,400	\$6,400	\$7,400	\$7,400
Area 15	\$6,600	\$8,200	\$8,200	\$8,600	\$8,600
Area 16	\$6,600	\$8,500	\$8,500	\$8,500	\$8,500
Area 17	\$6,600	\$7,500	\$7,500	\$8,000	\$8,000
Area 18	\$6,600	\$8,800	\$8,800	\$9,200	\$9,200
Area 19	\$6,600	\$8,200	\$8,200	\$8,600	\$8,600
Area 20	\$6,600	\$7,200	\$7,200	\$7,400	\$7,400

Area Negotiated Standards – Youth Credential Attainment

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.49	0.55	0.55	0.50	0.50
Area 2	0.49	0.58	0.58	0.53	0.53
Area 3	0.49	0.55	0.55	0.50	0.50
Area 4	0.49	0.60	0.60	0.60	0.60
Area 5	0.49	0.55	0.55	0.50	0.50
Area 6	0.49	0.55	0.55	0.50	0.50
Area 7	0.49	0.55	0.55	0.50	0.50
Area 8	0.49	0.55	0.55	0.50	0.50
Area 9	0.49	0.55	0.55	0.50	0.50
Area 10	0.49	0.50	0.50	0.50	0.50
Area 11	0.49	0.50	0.50	0.50	0.50
Area 12	0.49	0.60	0.60	0.55	0.55
Area 13	0.49	0.51	0.51	0.51	0.51
Area 14	0.49	0.55	0.55	0.60	0.60
Area 15	0.49	0.55	0.55	0.50	0.50
Area 16	0.49	0.53	0.53	0.50	0.50
Area 17	0.49	0.55	0.55	0.50	0.50
Area 18	0.49	0.63	0.63	0.50	0.50
Area 19	0.49	0.55	0.55	0.50	0.50
Area 20	0.49	0.50	0.50	0.50	0.50

Area Negotiated Standards - Youth Education, Training, or Employment

2ND QUARTER AFTER EXIT

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.49	0.67	0.67	0.68	0.68
Area 2	0.49	0.68	0.68	0.70	0.70
Area 3	0.49	0.67	0.67	0.72	0.72
Area 4	0.49	0.70	0.70	0.72	0.72
Area 5	0.49	0.64	0.64	0.64	0.64
Area 6	0.49	0.67	0.67	0.67	0.67
Area 7	0.49	0.67	0.67	0.72	0.72
Area 8	0.49	0.67	0.67	0.72	0.72
Area 9	0.49	0.70	0.70	0.72	0.72
Area 10	0.49	0.64	0.64	0.67	0.67
Area 11	0.49	0.62	0.62	0.67	0.67

Area 12	0.49	0.70	0.70	0.72	0.72
Area 13	0.49	0.69	0.69	0.74	0.74
Area 14	0.49	0.67	0.67	0.72	0.72
Area 15	0.49	0.67	0.67	0.70	0.70
Area 16	0.49	0.63	0.63	0.65	0.65
Area 17	0.49	0.67	0.67	0.70	0.70
Area 18	0.49	0.70	0.70	0.70	0.70
Area 19	0.49	0.61	0.61	0.70	0.70
Area 20	0.49	0.65	0.65	0.67	0.67

Area Negotiated Standards - Youth Education, Training, or Employment

4TH QUARTER AFTER EXIT

Area	PY17	PY18	PY19	PY20	PY21
Area 1	0.49	0.65	0.65	0.68	0.68
Area 2	0.49	0.68	0.68	0.71	0.71
Area 3	0.49	0.65	0.65	0.70	0.70
Area 4	0.49	0.67	0.67	0.70	0.70
Area 5	0.49	0.61	0.61	0.62	0.62
Area 6	0.49	0.65	0.65	0.65	0.65
Area 7	0.49	0.65	0.65	0.71	0.71
Area 8	0.49	0.65	0.65	0.70	0.70
Area 9	0.49	0.72	0.72	0.72	0.72
Area 10	0.49	0.65	0.65	0.65	0.65
Area 11	0.49	0.60	0.60	0.65	0.65
Area 12	0.49	0.68	0.68	0.70	0.70
Area 13	0.49	0.67	0.67	0.72	0.72
Area 14	0.49	0.65	0.65	0.70	0.70
Area 15	0.49	0.58	0.58	0.68	0.68
Area 16	0.49	0.62	0.62	0.64	0.64
Area 17	0.49	0.65	0.65	0.68	0.68
Area 18	0.49	0.69	0.69	0.70	0.70
Area 19	0.49	0.59	0.59	0.68	0.68
Area 20	0.49	0.65	0.65	0.67	0.67

Transparent

Area Negotiated Standards - Youth Measurable Skill Gains

Area	PY20	PY21
Area 1	0.40	0.40
Area 2	0.43	0.43
Area 3	0.37	0.37
Area 4	0.37	0.37
Area 5	0.45	0.45
Area 6	0.37	0.37
Area 7	0.37	0.37
Area 8	0.43	0.43
Area 9	0.47	0.47
Area 10	0.37	0.37
Area 11	0.37	0.37
Area 12	0.45	0.45
Area 13	0.37	0.37
Area 14	0.50	0.50
Area 15	0.45	0.45
Area 16	0.37	0.37
Area 17	0.37	0.37
Area 18	0.40	0.40
Area 19	0.37	0.37
Area 20	0.37	0.37

Area Negotiated Standards - Youth Median Earnings **2ND QUARTER AFTER EXIT**

Area	PY20	PY21
Area 1	\$3,300	\$3,300
Area 2	\$2,600	\$2,600
Area 3	\$2,500	\$2,500
Area 4	\$3,000	\$3,000
Area 5	\$2,800	\$2,800
Area 6	\$2,300	\$2,300
Area 7	\$2,800	\$2,800
Area 8	\$2,400	\$2,400
Area 9	\$2,700	\$2,700
Area 10	\$2,700	\$2,700
Area 11	\$2,300	\$2,300
Area 12	\$3,100	\$3,100

Area 13	\$2,800	\$2,800
Area 14	\$3,100	\$3,100
Area 15	\$2,500	\$2,500
Area 16	\$2,800	\$2,800
Area 17	\$2,700	\$2,700
Area 18	\$2,000	\$2,000
Area 19	\$2,200	\$2,200
Area 20	\$3,000	\$3,000

Comparing Ohio's Actual vs. Negotiated Performance to National Actual vs. Negotiated Performance: PY2019

To better understand Ohio's performance compared to the nation, we analyzed the difference between the WIOA performance rates negotiated with the USDOL and the actual performance rates. These figures do not include the adjustments USDOL makes when determining success or failure of a program's performance goals.

In PY2019, there were 14 combinations of groups and metrics that were appropriate to calculate the percent difference between each state's negotiated and actual rate. These metrics are those that are required under WIOA that are not currently in the process of developing baseline levels of performance. Of the 14 metrics, Ohio reached or exceeded 13 negotiated standards. Ohio exceeded its standards more than the national average in 10/13 instances and did comparatively better than national average in 11/14 instances.

% Difference Negotiated to Actual: Adult

	Employment Rate 2nd Quarter	Employment Rate 4th Quarter	Median Earnings 2nd Quarter	Credential
Calculation	After Exit	After Exit	After Exit	Attainment
Ohio Negotiated minus Actual Performance	4.9%	15.6%	13.1%	26.7%
National Average	2.1%	8.9%	14.9%	14.9%
Difference from National Average	2.8%	6.8%	-1.7%	11.8%

% Difference Negotiated to Actual: Dislocated Worker

	Employment	Employment	Median	
	Rate	Rate	Earnings	
	2nd Quarter	4th Quarter	2nd Quarter	Credential
Calculation	After Exit	After Exit	After Exit	Attainment
Ohio Negotiated minus Actual Performance	0.2%	5.3%	5.1%	24.8%
National Average	2.3%	0.4%	12.7%	10.3%
Difference from National Average	-2.0%	4.9%	-7.6%	14.4%

% Difference Negotiated to Actual: Youth

	Education and Employment Rate 2nd Quarter After	Education and Employment Rate 4th Quarter After	Credential
Calculation	Exit	Exit	Attainment
Ohio Negotiated minus Actual Performance	12.1%	13.8%	-2.0%
National Average	5.6%	10.0%	-3.1%
Difference from National Average	6.5%	3.8%	1.1%

% Difference Negotiated to Actual: Wagner-Peyser

	Education and	Education and	
	Employment Rate	Employment Rate	
	2nd Quarter After	4th Quarter After	Credential
Calculation	Exit	Exit	Attainment
Ohio Negotiated minus Actual Performance	5.9%	9.2%	18.6%
National Average	2.7%	3.3%	16.9%
Difference from National Average	3.2%	6.0%	1.7%

Comparing Ohio's Actual vs. Negotiated Performance to National Actual vs. Negotiated Performance: PY2020

To better understand Ohio's performance compared to the nation, we analyzed the difference between the WIOA performance rates negotiated with the USDOL and the actual performance rates. These figures do not include the adjustments USDOL makes when determining success or failure of a program's performance goals.

In PY2020, there were 18 combinations of groups and metrics that were appropriate to calculate the percent difference between each state's negotiated and actual rate. These metrics are those that are required under WIOA that are not currently in the process of developing baseline levels of performance. Despite the impact of COVID-19, Ohio reached or exceeded 11/18 negotiated standards. Additionally, Ohio exceeded its standards more than the national average in 7/11 instances and did comparatively better than national average in 10/18 instances.

% Difference Negotiated to Actual: Adult

	Employment Rate 2nd Quarter After	Employment Rate 4th Quarter After	Median Earnings 2nd Quarter After	Credential	Measurable
Calculation	Exit	Exit	Exit	Attainment	Skill Gains
Ohio Negotiated minus Actual					
Performance	-7.2%	-7.0%	14.0%	13.5%	12.1%

National Average	-3.6%	-2.9%	8.4%	8.8%	17.9%
Difference from					
National Average	-3.6%	-4.1%	5.6%	4.7%	-5.8%

% Difference Negotiated to Actual: Dislocated Worker

	Employment		Median		
	Rate 2nd	Employment	Earnings 2nd		
	Quarter After	Rate 4th Quarter	Quarter After	Credential	Measurable
Calculation	Exit	After Exit	Exit	Attainment	Skill Gains
Ohio Negotiated					
minus Actual					
Performance	-13.5%	-11.2%	4.7%	11.3%	11.3%
National Average	-4.3%	-1.1%	10.6%	7.9%	22.2%
Difference from					
National Average	-9.3%	-10.1%	-6.0%	3.5%	-10.8%

% Difference Negotiated to Actual: Youth

	Education and	Education and			
	Employment	Employment	Median		
	Rate 2nd	Rate 4th	Earnings 2nd		
	Quarter After	Quarter After	Quarter After	Credential	Measurable
Calculation	Exit	Exit	Exit	Attainment	Skill Gains
Ohio Negotiated					
minus Actual					
Performance	-0.6%	3.1%	12.4%	12.6%	37.2%
National Average	-1.9%	0.6%	8.4%	-3.1%	7.2%
Difference from					
National Average	1.3%	2.5%	4.0%	15.6%	30.0%

% Difference Negotiated to Actual: Wagner-Peyser

	Employment Rate 2nd	Employment Rate 4th	Median Earnings 2nd
Calculation	Quarter After Exit	Quarter After Exit	Quarter After Exit
Ohio Negotiated minus			
Actual Performance	-3.9%	-4.1%	4.7%
National Average	-7.8%	-5.9%	9.3%
Difference from National			
Average	3.8%	1.8%	-4.6%

Appendix C: OhioMeansJobs.com

The following table includes a list of requirements from the RFP compared to a review of the data provided to ODJFS, as referenced in **Recommendation 7**.

OhioMeansJobs.com Data Requirements Checklist

RFP Requirements	Check	Check Source
Daily Site Visits	X	OMJ Page Traffic by User Type
Weekly Site Visits	X	OMJ Page Traffic by User Type
Monthly Site Visits	X	OMJ Page Traffic by User Type
Number of Unique Visitors	X	OMJ Page Traffic by User Type
Time Spent on the Site		
Referring Partners/Sites	X	OMJ User Count,
Employer Job Searches	X	Roll Up
Resume Searches	X	Roll Up
Utilization Metrics	X	OMJ User Count
Number of Users Registered	X	Roll Up
Metrics on Items Created and Saved in the Backpack		
Metrics on Career Plan		
Budget Calculator		
Career Profile		
Resumes	X	Resume Count
Resume Score	X	EOMJ Rezscore
Online Tracking	X	OMJ Page Traffic by User Type
Job Information		
City	X	OMJ Company Admin Report
County	X	OMJ Company Admin Report
Zip	X	OMJ Company Admin Report
Group of Counties		
Time	X	OMJ Company Admin Report
Function		
Site/Source		
Occupation		
Level of Experience		
Skills Certification		
Education Level		
Salary		
Job Type		
Green Level		
Employer	X	OMJ Company Admin Report
List of Employer	X	OMJ Company Admin Report
	X	OMJ Company Admin Report

Transparent

Effective

Efficient

Amount of Ad Volume		
Resume Information		
Job Title		
Years of Experience		
Timeframe of Experience		
Location (City, State, Zip, Area)		
Skills		
Resumes Updated Range		
Education Level		
School	X	Roll Up
Company	X	OMJ Company Admin Report
Maximum Salary		
Job Type	X	OMJ Company Admin Report
Job Duration		
Travel Option		
Relocation Option		
Source		
Citizenship		
Veteran Status	X	Ohio Seeker Demographic
Time Frames Required		
Daily	X	Amazon Demographic
Weekly	X	All Weekly Folder files
Month	X	All Monthly Folder Files
Calendar Year	X	OMJ and K12 Seeker Saved
T/MD		Occupation Report
YTD	X	OMJ K12 User Registration
State/Federal Fiscal Year		
Calendar Quarter		
Metrics by Geographical Area		

Appendix D: Work Search

The following table details the unemployment insurance work search requirements of every state, as referenced in **Recommendation 8**.

Work Search in Other States

State	Description	Activities per Week	Job Board Use
Ohio	Must be actively be looking for a job, No fewer than 2 job contacts per week, Keep proof of all job search activities, Must not be disabled	2	Required
Pennsylvania	Applicants apply for two jobs per week and one work search per week, must keep record of work search activities	2	Required
Indiana	Complete one work search activity per week, keep written record of activities	1	Encouraged
Michigan	Complete one work search activity per week, keep written record of activities	1	
Illinois	Must be eligible to work in the US, report full employment history, actively search for work, develop a work search plan, use IllinoisJobLink,	Unspecified	Required
Wisconsin	Must complete 4 work search activities per week, must keep documentation, register with JobCenterofWisconsin,	4	Required
Alabama	Complete one work search activity per week, keep written record of activities	1	
Alaska	Complete two work search requirements and keep written record	2	Mentioned, work search activities depend on proximity to a job center
Arizona	Conduct systematic and sustained search for work, including 4 activities per week with at least 4 days of activity	4	Encouraged
Arkansas	Complete work search activities	2 or 4	Required
California	Physically able to work, available for work, willing to accept work, perform work search activities	Unspecified	Required
Colorado	Complete and document work search, while unspecified it is highly recommended to complete 5 per week	5	
Connecticut	Complete 3 work search activities, document activities	3	Encouraged
Delaware	Complete at least 1 work search requirement, keep records of activities	1	Encouraged

Florida	Maintain an active work search of 3-5 activities depending on the county, record activities/contacts	3 or 5	Required
Georgia	Complete 3 work search activities per week and maintain detailed record of activities	3	
Hawaii	complete 3 work search activities per week and maintain a detailed record	3	
Idaho	Complete 2 work search activities per week and maintain a detailed record	2	
Iowa	Complete 4 work search activities per week and maintain a detailed record, register with IowaWORKS	4	Required
Kansas	Complete 3 work search activities per week and maintain a detailed record	3	
Kentucky	Maintain an active work search	Unspecified	Encouraged
Louisiana	Must request payments weekly, complete 3 job search activities per week,	3	Required
Maine	Must conduct 1 job search activity per week, sign up for MaineJobLink	1	Required
Maryland	Must conduct 3 job search activities, keep a log, and register for Maryland Workforce Exchange	3	Required
Massachusetts	Must conduct 3 job search activities, keep a log	3	Encouraged
Minnesota	Must conduct work search activities and keep a log	1	Encouraged
Mississippi	Mist conduct 3 job search activities, keep a log, register with Mississippi Works	3	Required
Missouri	Mist conduct 3 job search activities, keep a log	3	Encouraged
Montana	Must conduct 1 job search activity, be registered to the Montana Job Service Board system, maintain records of work contacts for 3 years after	1	Required
Nebraska	Must conduct 5 work search activities per week and keep a log	5	Encouraged
Nevada	Must conduct work search activities and keep a log	Unspecified	Required
New Hampshire	Must conduct a weekly work search	Unspecified	Encouraged
New Jersey	Must conduct a work search and log activities	Unspecified	
New Mexico	Must conduct 2 weekly work search activities and maintain a log	2	Encouraged
New York	Must conduct 3 work search activities and maintain a log	3	Encouraged
North Carolina	Must conduct 3 work search activities and maintain a log	3	Required
North Dakota	Must conduct active work search and maintain a log	Unspecified	Encouraged

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Oklahoma	Must conduct 2 weekly work search activities and maintain a log	2	Required
Oregon	Must conduct 5 weekly work search activities and maintain a log	5	Required
Rhode Island	Must conduct 3 weekly work search activities and maintain a log	3	
South Carolina	Must conduct 2 weekly work search activities and maintain a log	2	Required
South Dakota	Must conduct 2 weekly work search activities and maintain a log	2	
Tennessee	Must conduct 3 weekly work search activities and maintain a log	3	Encouraged
Texas	Must conduct a weekly work search activity and maintain a log	Unspecified	Required
Utah	Must conduct a weekly work search activity and maintain a log	4	Encouraged
Vermont	Must conduct 3 weekly work search activities, register for Vermont Job Link, and maintain a log	3	Required
Virginia	Must conduct 2 weekly work search activities, register for the Virginia Workforce Connection and maintain a log	2	
Washington	Must conduct 3 weekly work search activities and maintain a log	3	Encouraged
West Virginia	Must conduct a weekly work search activity and maintain a log	Unspecified	Required
Wyoming	Must conduct 2 work searches weekly	2	Required



OHIO DEPARTMENT OF JOB AND FAMILY SERVICES

FRANKLIN COUNTY

AUDITOR OF STATE OF OHIO CERTIFICATION

This is a true and correct copy of the report, which is required to be filed pursuant to Section 117.26, Revised Code, and which is filed in the Office of the Ohio Auditor of State in Columbus, Ohio.



Certified for Release 2/16/2023

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