

Business Plan Guidance

(revised 9/28/04)

Purpose

- It is a goal of the Ohio Workforce Policy Board (Board) that a strategic business plan will assist local workforce investment areas move towards a statewide workforce development system that is more demand-driven, customer-focused and accountable than the past system. Increasingly, workforce development is becoming an integral part of economic development. In Ohio, workforce development should be viewed not just as a short-term solution for individuals in need, but as an important contribution to long-term economic growth.

Overarching Principles

- The plan should be business driven.

It is the expectation of the Board that there is an increase in industry-focused workforce development activities to stimulate both economic and workforce development.

Major goals and specific operational objectives should be defined by the Local Workforce Investment Area (Local Area) to reach this outcome. Performance measures should be identified for the major goals. These could include:

1. *Increase in service inquires by employers in the target industries.*
2. *Increase in actual service delivery to employers in the target industries.*
3. *Increased quality of service to target industry employers.*
4. *Increased human resource investment by businesses in their employees.*
5. *Increase in jobs retained, upgraded, and new jobs created in the target industries, especially higher-paying skilled jobs.*

- The plan should be aligned with the needs of the regional economy.

The outcome is to move the Local Area's and their partners to the new "market demand-driven" service model, as envisioned by the Board.

1. *Improvement in the Local Area's ability to identify new service demands and design effective programs to respond to these demands.*
2. *Increases in customer satisfaction with workforce services delivered.*
3. *Increase in the number of customized (demand-driven) workplace solutions provided to employers.*

- The plan should be data driven.

An increase in data will assist in strengthening the Local Area's knowledge base about global business trends and these trends' impact on local job development and business expansion. Then use this knowledge to design better services to respond to businesses' global growth needs.

1. *Increased awareness by workforce developers and their boards about the impact of global business strategies on the local labor market.*
2. *Create a greater number of innovative workforce development programs that help companies manage globally distributed workforces.*
3. *Number of companies assisted by these services.*
4. *Number of workers trained and served by other related human resource development services.*
5. *Number of local jobs retained and upgraded, and new jobs created.*

- *The plan should be a comprehensive and integrated system that provides service to all individuals seeking help.*

It is hoped that an outcome of an increase in demand for Local Area and other workforce services by area employers will be achieved.

Major goals and specific operational objectives should be defined by the Local Area to reach this outcome. Performance measures should be identified for the major goals. These could include:

1. *Improved perception of Local Area services by employers.*
2. *Increase in service inquiries by employers, especially in targeted user segments.*
3. *Increase in actual service to target users.*
4. *Increased quality of service (customer satisfaction) to employers.*
5. *Increased human resource investment by businesses in their employees.*

- *The development of the plan should be a joint effort of all local workforce organizations and partners including local government officials and local economic development professionals.*

Two outcomes should be addressed:

1. *Strengthen collaboration among area economic development and workforce development organizations to better serve their shared business customers.*
 - i. *Increase in the number of service partnerships created.*
 - ii. *Increase the efficiency and effectiveness of economic development and workforce development service delivery (Create a seamless service delivery network).*
 - iii. *Reduction in friction and conflict between and among economic development and workforce development organizations serving the area.*
 - iv. *Increase in the team marketing of workforce development and economic development assistance services.*
2. *Increase the coordination of Local Area services by area other workforce service providers.*

Major goals and specific operational objectives should be defined by the Local Area to reach this outcome. Performance measures should be identified for the major goals. These could include:

- i. *Reduction in the duplication of efforts by local workforce programs.*
- ii. *Increase in the number of partnerships formed by workforce service providers.*

- iii. *Strategic re-focusing of investments to serve priority clients or customers, such as growth industries and target populations.*
- iv. *Increase in employer awareness of available services and activities by key user audiences.*

- The plan should be aligned with AdvanceOhio core values.
As listed on page two of the Board's AdvanceOhio strategic plan.

Plan Outline

I. Executive Summary

(Brief summary of each section that gives an overall description of what will be (is being) accomplished.)

It is important to define the three elements to be linked in the Local Area business plans:

- *Workforce Development.*
- *Economic Development.*
- *Business Strategies.*

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
Executive Summary	overall description of area specific design and characteristics, historical background and perspective	summary of info included in overall business plan; mission/vision statements	MOU – revised Statement of Duration and Annual Review; Revised Signature Pages	local	Julia Hinten 728-4878

II. Workforce Area Description

(This section should provide a current description of the regional economy with a focus on workforce characteristics.)

Workforce development is the central focus of Local Area activities. Their job is to provide services that help workers and employers become more competitive. Guidance from both the U.S. Department of Labor and the Board has urged Local Areas to become more employer-focused in their efforts. This shift helps to connect workforce development activities to economic development efforts in the local labor market. Within their business plan, Local Areas should be asked to address both client (customer) segments in their service markets:

- *Employers (Greatest attention should be given here.)*
- *Workers/individual job seekers. (Less attention given.)*

The plans should identify and describe the following types of workforce development resources:

1. *All Local Areas-funded workforce development activities, serving both employers and workers. This should include programming aimed at special populations, target industries, etc.*
2. *State of Ohio workforce development resources, including the Board, the Ohio Department of Development's Ohio Investment in Training Program, and the various services offered by the Ohio Department of Job and Family Services.*
3. *Higher education-based workforce development programs, continuing education services, adult education services, certification-based training, human resource assessment services, and other related employment services. Special attention should be given to the current and future roles of community colleges in workforce development. The activities of private for-profit colleges and universities, such as the University of Phoenix, Apollo, DeVry, Kaplan, Sylvan, and others, should also be included.*
4. *Private training companies, like Achieve Global, Accenture Learning, ClicktoLearn, Carnegie Learning, Plato, and major training consultants, should be included.*
5. *Secondary and post-secondary education-based workforce development activities, including Vo-Tech, Tech Prep, ABLE, Adult Workforce Education and other programs. (In some cases, these programs span secondary and post-secondary education.)*
6. *Employer-based workforce development initiatives, such as those undertaken by the metro chambers in Columbus and Cleveland on behalf of their business members.*
7. *Association-based training programs, covering the gamut from skilled trades to professional certification and re-certification.*
8. *Talent retention and recruitment efforts. (Brain Drain/Gain resources).*
9. *Corporate universities, such as Eaton University, Bank One, and others located across Ohio.*
10. *Trade and industry unions, such as the International Brotherhood of Electrical Workers, United Auto Workers, and others.*

One useful way to capture this information is to assemble Human Resource (HR) managers from local companies and ask them to identify who are the players in servicing the local labor market.

Economic development activities include those public and private efforts aimed at developing business and jobs at the neighborhood, municipal, county, regional, and state levels. These activities include:

1. Chambers of commerce, including the larger metro chambers and the smaller community chambers.
2. Private non-profit economic development organizations, including regional organizations like the Dayton Regional Coalition and the Regional Growth Partnership of Toledo, and local development corporations, like neighborhood and community development corporations.
3. Local government (city and county) economic development offices and agencies.
4. State of Ohio Department of Development divisions, programs, and regional offices.
5. Utility economic development organizations, such as AEP, Cinergy, and FirstEnergy.
6. Port authorities with an economic development focus, such as those in Cleveland, Columbus, and Toledo.
7. International trade groups and associations, such as the Cleveland World Trade Center.
8. Travel and tourism bureaus, including those serving metro areas and smaller communities.
9. Technological innovation organizations, including the Edison Technology Centers, such as CAMP, Inc. in Northeast Ohio.
10. Entrepreneurial development and small business development groups, such as the Council on Smaller Enterprises (COSE) in Greater Cleveland.

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
a. Demographics & skills attainment level of the population (working & non-working)	age, sex, race, income, number of employed & unemployed, skills attainment level of the working & non-working populations	focus groups, community mtgs., surveys	(5YP) Sect. III. Q1. - Identify the workforce investment needs for the following groups.....	Five-Year Plan Local Plan Guidance, Pgs. 1-3; L.M.I./Census data	John Weber 644-8836 Mark Schaff 466-1109
b. What is the makeup of business in the workforce area by industry sectors?	percent of manufacturers, services industries, health care industries, etc.			L.M.I.	Mark Schaff 466-1109

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
c. What percent of jobs exist in each sector?	breakdown of major industry sectors and specific occupations		(5YP) Sect. III Q.2 and Q.2a - Describe the current and projected employment oppty's in the local area.	Five-Year Plan Local Plan Guidance, Pgs. 5-8; LMI County Profiles	Mark Schaff 466-1109
d. What educational attainment is needed to do these jobs?	% of population breakout on education attainment. Does your supply of labor meet the educational requirements of the employers?	employer surveys and input	(5YP) Sect. III. Q3. - Describe the job skills necessary to obtain current and projected employment.....	L.M.I. /Census data; Five-Year Plan Local Plan Guidance, Pg. 9	Mark Schaff 466-1109
e. What resources are available for training in the workforce development area?	primary & secondary education systems, colleges, adult workforce ctrs., private trng. providers, apprenticeships, etc.	placement rates of training institutions	(5YP) Sect. III. Q.6 - Provide a description and assessment of the type and availability of adult and dislocated worker...	Five-Year Plan Local Plan Guidance, Pgs. 16-18; Eligible Provider Training List; Apprenticeship Programs	Mark Schaff 466-1109
f. Who else is providing One Stop type services?	other providers of job seeker, business, and youth services in the area; fee-based, for-profits, non-profits.	gap analysis: Why are customers using venues other than the One Stop? What is lacking in the One Stop?		local	Julia Hinten 728-4878

III. Current Operations

(This section should describe what the regional workforce system and their associated partners are currently doing to assist the workforce.)

This section should pull the information collected above and a matrix of the workforce development resources should be included in the business plan, as well as a matrix created that identifies the economic development organizations, their service areas, and major functions is a useful starting point in identifying relevant economic development activities.

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
a. How are the area resources being used to support local workforce efforts?	complete overview of business and job seeker services; partner and site listings, partner service responsibilities and descriptions, customer flows (business, job-seeker, youth), common documents, local area contact info	Intergovernmental agreements (where applicable); WIB resolutions pertaining to One-Stop Operator selection and duties; Policies and Procedures	(5YP) Sect. III. Q.4(a)(b)(d)(e), Q.7, Q.8, Q.12 – Provide a description of the One Stop delivery system, et.al. MOU – entire Worksheet A & Partner and Site Information	Five-Year Plan Local Plan Guidance, Pgs. 10-13, 19-21, 25; MOU – newly revised format for inclusion to this plan available at website listed below	Tom Hutter 995-2224
b. Where is the majority of time and resources being spent? Are all services receiving the correct amount of staff time and resources based on the workforce area’s priority needs?	matrix of shared services	partner meetings	MOU – Shared Services Pool from Worksheet B (staff time value)	MOU – newly revised format for inclusion to this plan available at website listed below	Tom Hutter 995-2224

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
c. How are the workforce preparation and development needs of youth being addressed?	complete overview of youth services	Youth Plan, Youth Committee Roster, Youth Policies and Procedures	(5YP) Sect. III. Q.15, Q.16, Q.17, Q.18(a)(b)(c), Q.19 – all pertain to description of youth services and strategies	Five-Year Plan Local Plan Guidance, Pgs. 28-39; MOU – Wrksht. A descriptions of youth services	John Weber 644-8836
d. Are there other local policies and procedures, assurances and certifications, and/or processes pertaining to the current operations of the local area?	various agreed upon terms, conditions, clauses, information sharing agreements, additional program policies, etc.	partner meetings	(5YP) Sect. II. Assurances and Certifications; (5YP) Sect. III. Q. 13 – Competitive Process Q.14 – Limited Funds Policy; MOU – applicable template clauses	Five-Year Plan Local Plan Guidance, Pgs. iii, 25-27; MOU – newly revised format for inclusion to this plan available at website listed below	John Weber 644-8836 Tom Hutter 995-2225
e. How is the local area ensuring continuous improvement of services and the One Stop System?	ongoing improvement processes to continuously meet customer needs	Continuous Improvement Plan	(5YP) Sect. III. Q.4(c); MOU – revised Continuous Imp. & Cross-Trng. Clauses; One Stop Certification Report includes Continuous Improvement Plan	Five-Year Plan Local Plan Guidance, Pg. 12; One-Stop Certification Report; MOU – revised clauses	Tom Hutter 995-2224
f. Identify the needs not being met in the workforce area. Can additional partnerships be created to help meet these needs?		gap analysis using information from above question II.f.; discussion with local WIBs, RACs		local	Julia Hinten 728-4878

IV. Market Trends Analysis

(This section should provide information about the changes occurring in the economy and the needs of both job seekers and employers.)

*The **Business Strategy** component should identify the major business strategies employed by companies in the Local Area service area and how these strategies impact job development and human resource management within the area. A comprehensive assessment of these activities will not be possible for most Local Areas, but examples illustrating these activities should be possible for all the Local Areas to include in their business plans. Below are some important ones the Local Areas should investigate, but the Local Areas should identify any others that also play an important role locally.*

Focus groups and interviews with local company officials will be the most effective way to identify the requested information. The business strategy component should include some assessment of:

- 1. The extent to which offshore sourcing (OO) of work and jobs is occurring in the area, and how these business strategies have already and will in the future impact business activity and jobs in the area. Example: Convergys' extensive relocation of work activities overseas from the Cincinnati area.*
- 2. The extent to which major corporate mergers and acquisitions (M&A) have already had or will impact future business activities and jobs in the area. Example: Northrop-Grumman's acquisition of TRW in the Cleveland area.*
- 3. The extent to which foreign direct investments (FDI) impacts economic growth, business activity and jobs in the area. Example: Honda's investment in Central Ohio.*
- 4. The prevailing business trends in terms of area business openings, closings, contractions, and expansions. Where are most new openings and expansions occurring, and where are most closings and contractions occurring? What trends exist in major industry sectors that drive area economic growth?*
- 5. The extent to which area employers have implemented major productivity improvement initiatives, such as Six Sigma and Lean Manufacturing, to reduce operating business costs, including labor costs.*
- 6. The extent to which area companies are involved with industry cluster development initiatives. Example: Keithley Instruments (Solon, Ohio) is a leader in the Northeast Ohio Instruments, Controls, and Electronics (ICE) Industry Cluster.*
- 7. The extent to which new product innovation and development is occurring in area companies and the impact of these efforts on area jobs and business activity. Example: Proctor and Gamble in Cincinnati is a leading consumer product innovator.*
- 8. The extent to which area companies are developing new advanced technologies that will create future generations of industries and jobs. Example: Nanotechnology research in local manufacturing or agricultural biotech innovations in rural areas.*
- 9. The frequency of initial public offerings (IPOs) by new startup businesses in the area. Example: Ohio Legacy Corporation in Wooster.*
- 10. The extent to which area companies are stepping up talent retention and recruitment efforts and the issues they face in finding the talent they need to grow their companies in the area. Also, local community-based efforts designed to reduce "brain drain" should be identified by Local Areas in their business plans. Example: American Greetings in Cleveland has a major push to attract creative workers.*
- 11. The extent to which area companies have innovated with private corporate universities, special business training centers, new human resource service outsourcing strategies, and other HR strategies that will have a dramatic impact on their employees.*

The extent to which major changes are occurring in the presence of the major types of business facilities in both manufacturing and service industries: a) headquarters; b) regional offices; c) back-offices and call centers; d) production operations; e) distribution, transportation and logistics; f) research and development and technical centers; and g) after-sales support operations. Which are growing and which are seeing a reduced presence in the area? Also, what are the major types of jobs associated with these operations?

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
<p>a. i. What do current employers want and need?</p> <p>a. ii. What are the worker populations whose needs should be addressed (displaced workers, aging, immigrant, emerging students, youth, disabled, etc.)? In what ways can these workers' needs be better?</p>	comparison of the current skill set of the population and the current training capacity	gap analysis using information from above question II.a; surveys, employer and partner focus groups		local - recommend contact with WIB business members for input	Julia Hinten 728-4878
b. What changes can we anticipate in the regional economy and local workforce that will have workforce development implications?		community discussions		local economic development agency; LMI; DOD Governor's Regional Rep	Julia Hinten 728-4878 Mark Schaff 466-1109
c. Which industries are growing, which are declining?	Use info from above question II.b	community discussions		local economic development agency; LMI; DOD Governor's Regional Rep	Julia Hinten 728-4878 Keith Ewald 752-6661

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
d. What ways can we transition workers in a declining industry into a growing industry by building on their existing skills?	incumbent worker training opprty's;	business and job seeker discussions; input from partner programs	(5YP) Sect. III. Q.9 – Provide a description of how the local board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities	Five-Year Plan Local Plan Guidance, Pgs. 22-23	Julia Hinten 728-4878 Mark Schaff 466-1109
e. What employers are you reaching and what employers should you focus more attention towards?	survey results; studies done by institutions – ex. Chamber of Commerce study (see end of matrix for website)	business discussions; input from partner programs; local surveys; input from economic development and chambers of commerce			Julia Hinten 728-4878 Mark Schaff 466-1109
f. What are some of the changes occurring in local demographics that may affect the current workforce system?	Census data on population, aging of the population, youth population, worker dearth			local economic development agency; LMI; DOD Governor's Regional Rep	Julia Hinten 728-4878 Mark Schaff 466-1109

V. Marketing and Communications

(This section should outline a strategy for creating awareness of services provided and connecting with all job seekers and employers in the regional workforce area.)

- *What is the current marketing strategy and what plans are in place for improvements?*
- *Are targeted job seekers and employees aware of the services provided?*
- *Which job seekers and employers need to be reached?*
- *Does the current marketing strategy relate to a statewide marketing initiative?*

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
a. What is the current marketing strategy and what plans are in place for improvements?	local outreach/marketing plans; funding sources for marketing; planned workforce summits, conferences, job fairs	Locally hired marketing consultants; WIB business member input	Reed Act Request Outreach Tactic template	local marketing plans; local area Reed Act Requests	Julia Hinten 728-4878 Tom Hutter 995-2224
b. Are targeted job seekers and employees aware of the services provided? Which job seekers and employers need to be reached?	penetration rates for job seekers and businesses;	customer surveys – job seeker, business, youth		SCOTI reports	Julia Hinten 728-4878 John Weber 644-8836
c. Does the current marketing strategy relate to a statewide marketing initiative?	status on One Stop Systems certification	GWPB initiatives; other statewide initiatives	One Stop System certification reports	One Stop System certification final reports	Julia Hinten 728-4878 Tom Hutter 995-2224

VI. Goal Setting and Measures of Success

(This section should use information learned in the above sections in order to set goals and define measures of success.)

This is a time when you should refer back to the overarching principles established in the business plan template.

A description of current and proposed future relationships that the Local Area has with the workforce development groups identified and the economic development groups identified should be included in the business plan. Close attention should be given here to the coordination of services offered by these different groups, and how these groups can work in partnership in the future, as well as the new ways in which the Local Areas can use these groups as resources, and new ways these groups can use the Local Areas as a strategic resources in their future work.

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
a. Understanding the information collected in the above sections, what goals should be set?		analysis using information from above sections; local WIB input		local analysis; input obtained at facilitated local meetings	Julia Hinten 728-4878
b. What measures will we use to evaluate our success? Using these measures can we translate our goals into numeric targets and specific deadlines? What is the return on public investment?	include current WIA Performance Measures along with locally defined goals and measures	identification of goals and tracking methods,	(5YP) Sect. III. Q.5 – Provide a description of the local levels of performance to be negotiated...et.al.; MOU – revised Perf. Goals and Perf. Reporting clauses; latest DOL negotiated Performance Goals	local analysis; input obtained at facilitated local meetings; Five-Year Plan Local Plan Guidance, Pgs. 14-15; MOU – revised clauses:	Julia Hinten 728-4878 John Weber 644-8836
c. How do these goals relate to the Ohio Workforce Policy Board’s goals?	Performance Measurement Report Card, AdvanceOhio core values, goals and objectives			local analysis; input obtained at facilitated local meetings; Performance Report Card available at ohioworkforce.org	Julia Hinten 728-4878

VII. Strategic Plan

(This section should describe the specific strategies that will be used to change/improve current operations/activities to help meet established goals.)

The Economic Development Element matrix created (referred to in Section III above) can help establish the strategic plan.

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
<p>a. Milestones – set up time frames of expected dates that goals will be accomplished.</p>		<p>information from above section – Goal Setting and Measures of Success; local WIB input</p>		<p>local analysis; input obtained at facilitated local meetings</p>	<p>Julia Hinten 728-4878</p>
<p>b. Are goals in place to more fully engage other workforce service providers in the local workforce area?</p>		<p>information from Sections II and III above should drive response; local WIB input</p>		<p>local analysis; input obtained at facilitated local meetings;</p>	<p>Julia Hinten 728-4878</p>

VIII. Financial Components

(This section should include all current public and private funding sources as well as identify additional sources that you would like to attract. Also includes all financial projections and allocations.)

This should include parts of all three elements of the matrix. If the Local Areas are not already using additional workforce and economic development resources, they should reflect potential partnerships here.

Business Plan Component	Info to Include	Documentation and/or Methods of Obtaining Info	5 Year Plan (5YP), MOU, and other documents Crosswalk	Resources (website addresses at end of document)	Internal Contact Person
a. Historical Data (at least three years if available) i. Income Statement ii. Statement of cash flows iii. Balance Sheet	current financial information (operating budget) regarding the One Stop System	reconciliations pertaining to MOU cost sharing	current Worksheet B from MOU		Tom Hutter 995-2224
b. Projected i. Income Statement ii. Statement of cash flows iii. Balance Sheet	projected financial information beginning July 1, 2005; new funding sources; potential grants; fee for service if applicable; other financial resources (i.e., private)	partner meeting for annual review of Resource/Cost Sharing Agreement (RSA)	Future Worksheet B – Resource/Cost Sharing Agreement	MOU – newly revised format for inclusion to this plan available at website listed below	Julia Hinten 728-4878 Tom Hutter 995-2224

Resources

E-mail addresses: jhinten@odod.state.oh.us
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Julia Hinten, Department of Development
Tom Hutter, ODJFS – Office of Workforce Development
John Weber, ODJFS – Office of Workforce Development
Mark Schaaf, ODJFS - LMI

Website Addresses:

- Business Plan Guidance Documents <http://www.ohioworkforce.org/gwpb/businessplan.stm>
- Five Year Local Plan Guidance (5YP) <http://www.ohioworkforce.org/WIAI/Local-Plan-Guidance-PY2004.pdf>
- Memorandum of Understanding (MOU) <http://www.ohioworkforce.org/OneStop/OneStopMOU.stm>
- Labor Market Information (LMI) <http://www.ohioworkforceinformer.org/cgi/databrowsing/?PAGEID=4>
- Current WIA Performance Goals
<http://www.ohioworkforce.org/LocalAreas/docs/Performance-Goals-Chart-PY2003-2004.pdf>
- Ohio State Apprenticeship Council <http://jfs.ohio.gov/apprenticeship/>
- Chamber of Commerce Study:
<http://www.uschamber.com/NR/rdonlyres/erhsryqxeh3svd6ypsqwvcqnr6vsfloakr74s5k4dpe42yxswwskmz6budaxmzg34psx3s7ox6cm2f/aspecialreportonfivemidwesternstates.pdf>