On-the-Job Training (OJT) FAQs

1.) Are we responsible for submitting GFEs if my company is not working on a Federally Funded Project during the year? Only companies working on active, federally funded ODOT projects are responsible for participating in the OJT program and reporting on GFEs.

2.) How much of ODOT’s construction program is completed by companies below $39.5 in revenues? All DBEs are at or below $23.98 million. For non-DBEs, we can’t answer this until we receive exemption requests. We don’t otherwise track non-DBE firms’ revenues.

3.) When completing work as both a General Contractor (GC) and a Subcontractor how are we to differentiate the hours performed as a GC (and under the OJT requirement) to be differentiated from the subcontractor hours? The I-29 captures the contractor’s total workforce on all projects performed in the State of Ohio. The I-29 captures federal, state, and local projects for the contractor, all of which count towards the contractor’s OJT goal attainment (This information is different than what was explained during the webinar. The webinar explained that only federal projects count toward the OJT goal. Upon closer review of the data, federal, state, and local projects will count toward the OJT goal).

4.) If we are investing in apprentices as a subcontractor, how are we to receive credit for those efforts and count those hours towards our goal attainment? Subcontractors do not receive the monthly OJT goal attainment email and are not required to participate in the OJT program.

5.) How do we get a copy of the on-screen presentation? The webinar will be released and added to the ODOT website.

6.) Can you please define a trainee vs an apprentice? A trainee is an employee the company trains through an internal non-registered company program. Trainees do not count toward OJT apprentice goals. Apprentices are obtained through a registered apprenticeship program. If the company is unionized, apprentices are obtained through a union hall.

7.) What portion of ODOT’s program is completed by general contractors, as opposed to subcontractors? For 2019 current report (dates 1/1/2019 – 9/30/2019) has 126 Primes Contractors & 226 Subcontractors.

8.) If a company falls under the total receipts threshold and we are achieving a 3.29% apprenticeship would this be considered a GFE? Yes, any efforts made toward the apprenticeship goal would be considered a GFE.

9.) Do apprentices only get counted, if they are in a minority class or do you report apprentices for all classes? Apprentices of all races get counted.
10.) Where can we find new minority/female and disadvantaged lists of organizations to reach out for employment? Currently, ODOT does not have a list of organizations. Depending on the type of work your company does and where your company is located, you can do a search online to start connecting with organizations to recruit employees.

11.) What are unions doing to increase their apprenticeship programs? ODOT plans to engage with unions and discuss their efforts at a later time. At this time, we cannot speak to the recruitment actions taken by unions.

12.) Is there a difference between fully funded and partially federally funded projects? Are all projects counted toward GFES? For purposes of OJT, there is no difference between fully federal funded and partial federal funded projects. All prime contractors who are awarded projects >0 for federal funding are responsible for OJT goals, and will be able to submit GFES when the goal is not met. All projects can count toward GFES.

13.) When are the GFES due? After the final OJT goal attainment report is ran for 2019, it will be determined which companies met the OJT goal and which companies did not. The companies that did not meet the 2019 goal will need to report GFES after the start of 2020 (date TBD).

14.) Will I only get an email if our company has not met the OJT goal? ODOT will send an email to companies who do not meet the goal to explain next steps. Additionally, to confirm the OJT goal has been met, ODOT will send an email to companies who met the goal.

15.) Is the journeyman/apprentice ratio taken into consideration of GFES? Yes. Please explain the journeyman/apprentice ratio in your GFE response. All GFE responses will be taken into consideration.

16.) Do the OJT monthly emails go to the email addresses listed on our prequalification? I have never received an email concerning the OJT. Yes, we use the emails listed in the prequalification database. If you wish to add an email address, please email dot.dbe.ojt@dot.ohio.gov

17.) Will there be any difference in the program for Mega Projects? OJT goals can be set specifically for mega projects – see OJT program plan document. At this time, however, we are not setting goals on a project basis.

18.) The data on the I-29 is for private and public work. That being said, are the OJT apprentice goals in the monthly email based on data entered into the I-29? This is correct. After the webinar, it was determined that the data entered into the I-29 could not be extracted for federal projects only. Therefore, all private and public work for prime contractors enter into the I-29 are counted toward a prime’s OJT goal calculation.

19.) If the demographics of our full-time workforce are above the percentage goals of women and minorities, why do we need to hire apprentices? As of this point, the OJT program does not take the demographics of a contractor’s full-time workforce into account toward the OJT goal.

20.) I did not receive the email containing GFE information. I have received the other emails. When and where will the GFE information be available? GFE information will be posted on the ODOT website and communicated after January 1, 2020.

21.) We have prime jobs and subcontracted jobs. How are the prime jobs segregated from the sub jobs or how would you know that information from the I29? ODOT considers all information entered into the I-29 toward the OJT goal. Prime and subcontracted jobs cannot be segregated out (this is different information than what was originally said during the webinar). The data that is entered into the I-29 is what counts toward the goal.

22.) Our I-29 contains ODOT and non-ODOT projects. Are non-ODOT projects hours calculated? Yes. Non-ODOT projects are calculated toward the OJT goal. The information you enter into the I-29 is the information counted towards GFEs.
toward the goal. This is different than what was communicated previously in the webinar. I-29 data is not able to be filtered.

23.) How do you know which hours on the I-29 are for Federally funded Projects? We do not. After close inspection of the data, it was discovered that we cannot separate out the data for federal vs local projects, prime vs sub-contractor work. The data that you enter into the I-29 is what is counted toward the OJT apprentice goal.

24.) Is the threshold of receipts an average of 3 years or just the previous year? More information on the threshold of receipts will be communicated during the GFE process.

25.) Are we exempt from the program if our receipts fluctuate above and below the threshold from one year to the next? Program requirements depend on the year. Therefore, for the year you are above the threshold, the OJT Apprentice Program requirement would apply to you. If your company is below the threshold for a particular year, you’d be exempt from the requirement of having an apprenticeship program that particular year.

26.) Can the presentation be made available to participants to share and present to our office staff after this webinar? Yes, the webinar will be posted to the ODOT webpage.

27.) You mentioned that you had sent out some GFE reporting info last week. We have not received that. Is it available somewhere? The GFE information will also be posted to the ODOT website.

28.) If we aren’t getting the monthly goal email, who should we contact to get the email address updated? Email the OJT support inbox: dot.dbe.ojt@dot.ohio.gov

29.) Why does ODOT include Subcontractors in the Yearly goal. But subcontractor apprentices do not count towards the contractor’s goal? The Prime Contractor goal attainment percentage in the monthly email is determined on all data entered into the I-29 – for all projects. Prime contractors can count local and privately funded projects as well as federal projects in the I-29 data entered each month. If a Prime contractor falls short of the goal for the year, they can submit sub-contractor apprentice information as a part of the good faith effort documentation required.

30.) How do you determine what qualifies someone to be a "disadvantaged" worker? Per the federal CFR, persons may be socially and/or economically disadvantaged. While social and economically disadvantaged is a broad term, it is important to consider all persons for apprenticeships and employment, regardless of a goal. The Code of Federal Regulations (CFR) further defines a social and or disadvantaged person.

31.) Will you share a link to where the GFE information will be located for those of us who did not receive it? GFE information will be posted to the ODOT OJT website. http://www.dot.state.oh.us/Divisions/ODI/SDBE/Pages/EEO-OJT-on-Federal-aid-Construction-Contracts.aspx

32.) Are unskilled workers paid full (prevailing wage) scale considered an acceptable GFE? Paying prevailing wage is the law and unrelated to any GFE for the OJT program.

33.) If our company is below the business size threshold, why are we still required to do the GFE submittal? Good Faith Efforts (GFEs) should be a regular part of your business (e.g., recruiting, outreach to diverse recruitment sources etc.). GFEs exist to report what your company already should be doing.

34.) Is the OJT goal separate from DBE Goals? Yes, OJT goals are completely separate from DBE goals.

35.) How do I know if my ODOT project is federally funded? If the proposal has Proposal Note 061, Wage Scale, on All Federal-aid Projects, it’s federally funded. However, all projects are counted toward the OJT goal as explained in #29.

36.) If we don’t meet the goal, but we have trainees and report those trainees in our GFEs, does that work as a substitute for OJT apprentice goals? Trainees can count as a GFE. However, GFEs are evaluated on a case-by-case basis.
37.) Is there a way to file a corrected I-29 form for a prior month in 2019 that had an error? Contact the Ohio Department of Administrative Services at 614-466-8380 or eod@das.ohio.gov

38.) How do we get the FAQ responses? FAQ responses will be posted to the ODOT website.

39.) Do we need to reach a 7.6% goal per each federally funded project or 7.6% for our total workforce over all projects? 7.6% over all projects. Please note, this is different than what was originally communicated in the webinar. See question #29.

40.) Is the $39.5 million threshold for company in total or just revenue from construction contract or federal contracts? A substantial amount of our income is from sales and rental. The 39.5 is total receipts listed on a tax return. Therefore, it is all revenue.

41.) How do we get the exemption form? The exemption form will be included with the GFE process. Additional information about the GFE process will be communicated after January 1, 2020.