

ATTACHMENT 26.

Youth Apprenticeships Policy



**KANSAS CITY & VICINITY
WORKFORCE DEVELOPMENT BOARD**



Serving the city of Kansas City, Mo. and Cass,
Clay, Platte, and Ray counties.

The Full Employment Council, Inc. (FEC) is the fiscal
agent and workforce support organization for the
Kansas City & Vicinity Workforce Development Board.

Workforce Innovation and Opportunities Act (WIOA) Policy

**CLASSROOM OCCUPATIONAL SKILL TRAINING, ON-THE-JOB TRAINING AND
WORK EXPERIENCES FOR YOUTH**

POLICY NUMBER: 2017-017, Modification 2

EFFECTIVE DATE: 10-01-2018

MODIFICATION DATE: 01-27-2020

APPROVED BY

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Full Employment Council, Inc.,
Managing Entity/Fiscal Agent
Kansas City and Vicinity Workforce Development Board

INQUIRIES

Questions about this issuance should be addressed by email to Latrina Collins, Director of Planning, Program Development and Evaluation at LCollins@feckc.org, who shall disseminate the agency response after consultation with Workforce Development Board Officers.

PURPOSE

The purpose of this issuance is to establish the procedures for Youth Classroom Occupational Skill Training, On-the-Job Training and Work Experience for Youth. This policy is a required statutorily required policy, and replaces Issuance No. 2017-017, Modification 1, Classroom Occupational Skill Training, On-the-Job Training and Work Experiences for Youth.

BACKGROUND

This Issuance is based upon Missouri Division of Workforce Development (DWD) Issuance No. 21-2017, Statewide On-the-Job Training Policy and Guidelines, Office of Workforce Development (OWD) Issuance No. 07-2019, Workforce Innovation and Opportunity Act (WIOA) Work Experiences for Youth Participants DWD Issuance No. 03-2015, WIOA Youth Framework and Design, and includes the form updated forms for On-the-Job Training.

POLICY

This Issuance will follow OWD Issuance No. Issuance No. 21-2017, Statewide On-the-Job Training Policy and Guidelines, Issuance No. 07-2019, Workforce Innovation and Opportunity Act (WIOA) Work Experiences for Youth Participants, Issuance No. 03-2015, WIOA Youth Framework and Design, or other current guidance on the topic located at jobs.mo.gov/dwdissuances.

I. YOUTH TRAINING ALLOWABLE EXPENDITURE AMOUNTS AND TIME PERIODS

The chart below provides an overview of the allowable amounts and time periods for the various program activities.

Program Activity	Amount	Time Period
Classroom Training	May pay up to \$4,000.00. May only exceed \$4,000.00 with Manager's, President's/Designee approval	Up to 12 months - May only exceed 12 months with President/designee approval
On-the-Job Training	May pay up to \$4,000.00; May exceed \$4,000.00 with Manager's, Officers' and President's/designee approval	Minimum 4 weeks or 160 hours; Average time period is 8 weeks or 320 hours; Maximum time period is 1,040 hours
Work Experiences	May pay up to \$4,000.00; May only exceed \$4,000.00 with Manager's and President's/Designee approval	Minimum 4 weeks or 160 hrs; Average time period is 8 weeks or 320 hours; Maximum time period is 12 weeks or 480 hours
Private Sector Work Experience/Pre-apprenticeship	May pay up to \$4,000.00	Minimum 4 weeks or 160 hrs; (work experience/pre-apprenticeships); May exceed \$4,000.00 with Manager's, Officers' and President's/designee approval

Prior to receipt of a training service: Youth must have already attended orientation,

- completed financial aid eligibility session,
- registered in www.jobs.mo.gov,
- completed a basic skills assessment,
- Talify results or O*Net results, based on assessment at the My Next Move site at: <https://www.mynextmove.org/explore/ip>,
- and completed the Employment Plan, including the Individual Service Strategy (ISS)

The Enrollment Committee must approve the enrollment of the Youth prior to the Youth starting on-the job training.

The customer's Employment Plan must contain short-term goal(s), long-term goal(s), objectives required to meet the goals, and a justification of appropriateness, including identification of the customer's skill gap between their current skills and skills required for an occupation. The plan must address these barriers and how these barriers will be addressed. The planning for training services must also account for Objective Assessment and address how the Objective Assessment supports the customer's training goals.

II. WIOA FOURTEEN (14) ELEMENTS OF THE YOUTH PROGRAM

Youth training occurs within the context of the fourteen (14) elements of WIOA Youth services. The Workforce Innovation and Opportunity Act requires that the purpose of WIOA funds for youth activities that include 14 program elements. These program elements are designed to fill the gaps in the lives of youth who lack the family, educational, and social frameworks to meet their essential needs. The following activities are available to youth participants, based upon each participant's objective assessment and individual service strategy:

1. Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential;
2. Alternative secondary school services, or dropout recovery services, as appropriate;
3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
 - (i) summer employment opportunities and other employment opportunities available throughout the school year;
 - (ii) pre-apprenticeship programs;
 - (iii) internships and job shadowing; and
 - (iv) on-the-job training opportunities;
4. Occupational skill training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the Local Board determines that the programs meet the quality criteria described in WIOA Sect. 123;
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
7. Supportive services;
8. Adult mentoring for a duration of at least 12 months that may occur both during and after program participation;
9. Follow-up services for not less than 12 months after the completion of participation;
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;
11. Financial literacy counseling;
12. Entrepreneurial skills training;
13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
14. Activities that help youth prepare for and transition to post-secondary education and training.

III. CLASSROOM OCCUPATIONAL SKILL TRAINING

YOUTH: Classroom occupational skill training may be provided to out-of-school youth ages 16 through 24, or in-school youth who graduate from high school prior to the end of the school year.

A. Recommendation of Youth for Occupational Skill Training:

Prior to receipt of occupational skill training:

- Youth must have already attended orientation,
- Completed the financial aid eligibility session,
- Registered in www.jobs.mo.gov,
- Completed the WorkKeys TABE, copy of school record, Hiset scores or ACT scores;
- Completed the Talify or O*Net Profiler at (<https://www.mynextmove.org/explore/ip>), and
- Completed an *Individual Service Strategy (ISS-MOJOBS code 413)*.

The Enrollment Committee must approve the enrollment of the Youth prior to the Youth starting classroom occupational skill training.

Classroom Occupational Skill Training must be full time (as defined by the school); DESE approved; and must lead to a certificate (credential). The length of the Classroom Occupational Skill Training may exceed 12 months if the training is in a demand occupation as identified by the Missouri Economic Research and Information Center (MERIC) and is approved by the President/CEO or designee.

B. Remediation: Youth who do not meet the minimum requirements will remediate based on occupational scores identified for the position and will be referred to appropriate external literacy and/or basic skill enhancement services and resources.

C. Approved Training Providers: The Career Development Executive (CDE) will provide an orientation on the requirements for participation in classroom occupational skill training. The web site for approved training providers, www.jobs.mo.gov, should be shared with the Youth as well as the **labor** market information regarding occupational demand so that the Youth can research eligible training providers and make an informed choice. Training providers may be out of the region or out-of-state of the Workforce Development Board region, as well as located outside of the State of Missouri as long as:

- the provider meets the approval of DWD
- the provider and training program are indicated as eligible on the Missouri's Eligible Training Provider System, as approved by the Workforce Development Board
- there is a reciprocal agreement between Missouri and the other State that each will accept the training facilities of the other, per CFR 29, 680.520
- Offer training in high-demand occupations and occupations that are consistent with the Local Plan of the Workforce Development Board
- Be a business that is e-verified

Training providers serving as a site for non-classroom training services (On-the-Job Training, Work Experience) are required to:

- Meet the requirements for the company to receive funding from the WIOA or the respective funding source
- Offer training in high demand occupations consistent with the Local Plan and meet other requirements such as offering quality training, a reliable pathway to employment for On- the-Job training and meeting other requirements for work-based training
- Be a business that is e-verified

D. Classroom Occupational Training Forms: Upon approval of the training by the Manager, the CDE will prepare a Classroom Occupational Skill Training Enrollment Packet comprised of the following documents, so that it can be submitted to Fiscal Department at least five (5) days prior to the training start date to verify the availability of funding:

- FEC-ITS (original)
- Release of Information form
- MOSCORES printout showing Workforce Development Board approval
- Case note documenting name of training, start date, anticipated end date, amount of ITA, Name of Provider
- Statement of Account/Bill or MOSCORES printout
- 300 activity code from MOJOBS with projected start date and end date
- Senior Management Approval for training costs that exceeds the maximum allowable, as appropriate

E. Monitoring Youth Progress: The CDE will obtain copy of final grades at the end of each semester. Additional funds should not be obligated without review of progress.

F. Maximum Dollar Amount. The *maximum* dollar amount to be paid from WIOA for classroom occupational skill training is \$4,000.00. This amount is subject to budget availability, is NOT an entitlement, and will vary dependent upon training area. This amount may be increased above \$4,000.00 by obtaining the written approval of the Manager, Officers' and President/CEO or designee. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding and must be submitted prior to the start of training.

G. Pell Grant: Youth recommended for enrollment in classroom occupational skill training must first apply for a Pell Grant or other types of financial aid. Upon receipt of the Pell Grant these funds must be used prior to Workforce Development Board funds. The Counselor must obtain a Pell Grant award letter. Receipt of Pell Grant funds shall be noted in the ITA.

H. Issuance of a Voucher to the Customer: Each customer approved by the Enrollment Committee and enrolled into classroom training shall be issued a voucher for training services which specifies the training provider, training program, amount of the voucher, and date of issue. The voucher shall be provided to the customer prior to the beginning of the class, with the voucher, including voucher number, forwarded to the training provider. If the customer does not attend the class within the allowable time from the start date of the class, the voucher shall immediately expire. This shall be relayed to the training provider. Issuing and tracking vouchers shall be administered by the Financial Aid Support Specialist.

I. Supportive Services: Please refer to the Issuance No. 2017-018, Modification 3, which outlines the Supportive Services available to Youth who are attending classroom occupational skill training. All OJT recommendations must provide reasonable and documented monitoring and audit trails that substantiate the need for the type of training.

IV. WORK EXPERIENCE (*MOJOBS code 425*) AND SUBSIDIZED EMPLOYMENT

Work Experience is integral to WIOA Youth Services. Work Experience is not a stand-alone activity, but must be delivered in conjunction with an educational component during the Youth participant's WIOA enrollment. The Workforce Development Board will expend a minimum of twenty percent (20%) of Youth program funding on Work Experience. Under WIOA, work experiences may include any of (1.) pre-apprenticeship programs, (2.) On-the-Job Training, (3.) Internships and Job-Shadowing, or (4.) Work Experiences available throughout the year, including summer employment (this type of activity is recorded as one service). The educational component

must be identified in the Individual Employment Plan and Training Plan prior to the participant starting the Work Experience.

Work Experience is available to in-school youth who are juniors and seniors in high school and to out-of-school youth ages 16 through 24.

A. Recommendation of Youth for Work Experience: Prior to receipt of a work experience, Youth must have already attended orientation, completed the financial aid eligibility session, registered in www.jobs.mo.gov, completed a basic skills assessment, completed O*Net Profiler in My Next Move (<https://www.mynextmove.org/explore/ip>) or Talify, and completed an Employment Plan prior to being enrolled in a work experience. The Enrollment Committee must approve the enrollment of the Youth prior to the Youth starting a work experience.

B. The Work Experience: The work experience may be with private, public and/or not for profit companies may or may not include a commitment to hire.

Work Experiences are recommended for Youth who usually have limited work experience (less than 6 months in the occupational field) and/or have just completed classroom occupational skill

training and are in need of additional training. Work Experiences are developed based on youth interest and in demand occupations.

In order to be eligible to participate in sponsored work experiences, an employer must have been in business for a minimum of twelve (12) consecutive months. This restriction applies across all Workforce Development Board programs and funding sources. It is the responsibility of the WDE to determine and document that the employer meets this eligibility requirement.

Employers who are participating in sponsored work-based training (on-the-job training or work experiences) for the first time may not train more than two (2) participants concurrently, regardless of the program in which they are enrolled or the funding source being used. Once the employer has successfully completed two work-based training activities, the employer is eligible to participate in additional work-based training activities and there is no maximum on the number of participants that may be trained at the employer.

It is the responsibility of the WDE to determine and document the eligibility of the employer.

Hours: The average number of hours for a work experience is 320 hours; the minimum hours for a work experience is 160; and the maximum number of hours is 480. Variances from the normal time periods require the approval of the President/CEO or designee. *Weekly hours may not exceed 40 hours, since Youth will not be paid for overtime.* The work experience hours and wage rate should be negotiated with the employer based on the needs of the Youth; the Youth's

education, training, and prior work experience; and the difficulty of the job. If a Youth works more than 6 hours per day the Youth must take a minimum of a half hour *unpaid* lunch break. The wage to be paid to customers in a work experience position is decided by the President/CEO based upon market conditions and availability of program funds.

1. **Work Experience:** Work experience is a means of providing basic work experience to those Youth with less than 6 months of work history within the last 12 months. Work experience is a short-term training designed for Youth to explore career opportunities to determine a career path.

2. **Part-time Work Experience:** Youth, who are concurrently working on their HISET, may be placed in part-time work experience with the approval of their case manager and manager.

C. Forms: Work Experience forms include the following:

- Obligation and De-obligation Form

- O-25 -Work Experience Agreement
- On-the-Job Training Skills Training Agreement
- W-4 Form (Federal)
- W-4 Form (State)
- I-9 Form with supporting (2) documents
- Medical Information Checklist (for emergency contact information)
- Electronic paycheck Form (Payroll Cards only)
- Payroll Authorization Form (Payroll Cards only)
- Seeker Closure Screen or Enrollment Screens (closure screen must document activity)
- Case Note documenting name and training start date and participation in the subsidized activity or work experience.
- E-Verify case verification report

D. Maximum Dollar Amount: The maximum dollar amount to be paid for work experience is **\$4,000.00**. This amount is subject to budget availability, is NOT an entitlement, and will vary dependent upon the training area. This amount may be increased above **\$4,000.00** by obtaining the written approval of the Manager, Officers' and President/CEO or designee. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding and must be submitted prior to the start of training. The amount of the OJT should not be communicated with the employer prior to approval of the OJT Obligation form.

E. Worksite Monitoring: The WDE will perform on-site monitoring of Youth in Pre- Apprenticeships or On-the-Job Training a minimum of every two (2) weeks. Attention will also be provided at the intervals of mid-point and end point of the participants' OJT activities regarding achievement of Measurable Skills Gains. A case note summarizing the Worksite Monitoring Report must be entered by WDE in MOJOBS real time.

F. Measurable Skill Gains: Measureable Skill Gains that occur during the customer's program will be tracked in MOJOBS.

G. Supportive Services: Youth who attend on-the-job training may be eligible for support services such as work-related clothing, tools, and equipment and transportation for up to 30 days during the Youth's first month of employment. Issuance No. 2017-018, Modification 3, Supportive Services, Post-Employment and Payments for Outcomes for WIOA Youth, provides additional information on support services available to Youth. Support services provided will be based upon the needs of the Youth, and must be documented in the Youth's Individual Service Strategy, *MOJOBS code 413*.

Contractors: Full Service Contractors shall provide supportive services directly for their customers but must follow Workforce Development Board approved procedures as outlined in this Issuance.

H. Activity Codes: Enrollment in MOJOBS of WIOA Youth Who Are Approved for Training: WIOA youth approved for training activities by the Enrollment Committee must be enrolled in the following MOJOBS activity codes:

<u>Code</u>	<u>Activity</u>
412	Objective assessment
413	Individual Services Strategy

Additional WIOA activity codes must be entered in MOJOBS as additional WIOA services are provided to WIOA youth. The reader is referred to Division of Workforce Development Issuance No. 03-2015, Workforce Innovation and Opportunity Act (WIOA) Youth Program Framework and Design (Attachment A).

I. Contractor Referral of Customers for Work Experience: Full Service Contractors should develop work experiences directly for their customers rather than referring the customers to the Full Employment Council, but must follow Workforce Development Board approved procedures as outlined in this Issuance.

V. YOUTH ON-THE-JOB TRAINING (*MOJOBS code 428*)

All youth should attend labor market information and financial literacy workshops to identify career pathways prior to being placed in any work experiences.

On-the-job training may be provided only to out-of-school youth ages 16 through 24, or in-school youth who graduate from high school prior to the end of the school year or youth that has high school equivalency.

A. Provisions for On-the-Job Training:

1. OJT agreements may be entered into with Registered Apprenticeship program sponsors or participating employers in Registered Apprenticeship programs of the OJT portion of such programs. Depending upon the duration of the Registered Apprenticeship, funds may cover some or all of the Registered Apprenticeship.
2. Customers must meet the following criteria, in addition to being determined eligible and enrolled by the Enrollment Committee:
 - a. Is unlikely, or unable, to obtain or retain employment that leads to economic self-sufficiency or wages comparable to – or higher than – wages from previous employment through career services; *and*
 - b. Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to – or higher than – wages from previous employment; *and*
 - c. Is in possession of the skills and qualifications to participate successfully in training services; *and*
 - d. Has selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individual is willing to commute or relocate; *and*
 - e. Is unable to obtain grant assistance from other sources to pay the costs of such training [including such sources as State-funded training funds, Trade Adjustment Assistance, and Federal Pell Grants established under Title IV of the Higher Education Act of 1965] or requires WIOA assistance *in addition* to other sources of grant assistance (including federal Pell Grants).

All of these eligibility requirements for training services **must** be met and documented before an individual can receive the OJT service. **Staff must also document these requirements in MOJOBS case notes.**

3. The industry sector and occupation shall be in high-demand as defined by the Workforce Development Board.
4. The occupation shall have a grade of A or A+ in the 2014-2024 Missouri Economic Research and Information Center (MERIC) outlook projections for the Kansas City region.
5. Other factors include the number of employees participating, wage and benefit levels and relation of the training to the competitiveness of the participant.
6. There is no State requirement for the establishment of due process procedures pertaining to testing for controlled substances.
7. Updated forms shall be used, as noted below:
 - a. OJT Program Agreement FEC Form O15
 - b. OJT Outline and Job Description
 - c. OJT Supplemental Agreement FEC Form O50
 - d. OJT Eligibility Notification FEC Form O15A
 - e. OJT Monitoring Report FEC Form O51 (Employer)
 - f. OJT Monitoring Report (FEC Worksite Monitoring Report (Participant)
 - g. OJT Monthly Invoice FEC Form O51A

(OJT Monitoring Reports now consist of two separate forms for Employer and Participant.)

B. Recommendation of Customers for Training Services: Development of an Employment Plan (EP), including assessments and required case-management services, is required before a participant can receive training service. The Employment Plan must contain short term and long term career goals.

Customers must also:

- Attended an Overview,
- Complete Wagner-Peyser enrollment,
- Attend the Financial Aid eligibility session,
- Youth customers must complete Objective Assessment,
- Complete the WIOA career services eligibility and enrollment process,
- **Complete a basic skills assessment,**
- Complete the Talify assessment **or O*Net Profiler at My Next Move** (<https://www.mynextmove.org/explore/ip>),
- OJT must be the best training opportunity for the customer, after considering options such as classroom training,
- Pursue training in a field that is a high demand occupation,
- Customers who are employed and eligible may receive OJT opportunities to increase their wages with a different company.

In addition, MOJOBS should indicate in the case notes that the customer is being recommended for training services. The Enrollment Committee must approve the enrollment of the customer prior to the customer starting training.

All OJT recommendations must provide reasonable and documented monitoring and audit trails that substantiate the need for the type of training.

Many times a company identifies a potential OJT participant first. In these cases, the individual lacks skills the employer requires and is in need of OJT. The company must first refer the individual to the Job Center for eligibility determination **prior to beginning the hiring process**. Any individual hired prior to the eligibility determination is not eligible for the federally funded OJT program.

C. Training Overview and Documentation of Need: The Career Development Executive (CDE) or Skills Team member will review the Employment Plan with the customer and document the need for on-the-job training, and indicate that the customer has a reasonable expectation of completing the OJT. The Workforce Development Executive will provide the customer a general orientation to training services including a description of the requirements for participation in OJT.

D. Employer Credentials and Position Requirements: Additionally, it is required that:

- A review is conducted to verify that the employer is not relocating,
- An OJT program agreement with a State agency or any other unit of government that operates WIOA programs,
- The OJT Program Agreement must have beginning and ending dates, and conclude within one year,
- There is documentation of a Skills Gap Analysis that justifies federal OJT funds,
- Variance in the Training Plan's start and end dates requires a Supplemental Agreement,
- The Training Plan and the participant's Employment Plan in the case management system document short-term and long-term goals, and identifies the skills gap between the participant's skills and the occupational skill requirements.
- The employer is not in layoff status and has not laid off employees for the past year,
- The training does not displace current employees,
- The company must have regulations that address safety and health issues,
- Appropriate supervision and training is provided for all participants,
- The position must not be seasonal employment,
- The wages and benefits should be appropriate based on O*NET State and National

Wage Tables,

- The position must be a full-time position, defined as 32 or more hours per week,
- Training must not impair any existing contracts for services or collective bargaining agreements,
- Training Agreements cannot be for temporary or intermittent employment, or for employment in an occupation for a fee,
- Participants cannot be employed in the construction, operation, or maintenance of a facility primarily devoted to sectarian instruction or religious worship,
- Employer has signed EEO and the complaint and Grievance forms.

E. Workforce Development Executive (WDE) Responsibilities: The WDE will develop an On-the-Job Training Program Agreement (Form O-15) with the employer which lays out the responsibilities of the Workforce Development Board and the employer and is a non-binding contract with the employer.

In order to be eligible to participate in sponsored OJT activities, an employer must have been in business for a minimum of twelve (12) consecutive months. This restriction applies across all Workforce Development Board programs and funding sources. It is the responsibility of the WDE to determine and document that the employer meets this eligibility requirement.

Employers who are participating in sponsored OJT activities for the first time may not train more than two (2) clients concurrently, regardless of the program in which they are enrolled or the funding source being used. Once the employer has successfully completed two OJTs, the employer is eligible to participate in additional OJT activities and there is no maximum on the number of customers that may be trained at the employer. It is the responsibility of the WDE to determine and document the eligibility of the employer.

The WDE completes the following forms:

- The Occupational Skills Training Plan
- O-15 – On-the-Job Training Program Agreement signed by employer, including the Legal Certifications and On-the-Job Training Program Agreement General Assurances
- O-17 – On-the-Job Training Skills Training Agreement
- The O-17 form details the employer’s employment and training needs and strategies for meeting those needs. The On-the-Job. Skills Training Agreement must ensure that participants are provided a structured training opportunity in which to gain the knowledge and competencies necessary to be successful in the occupation in which they receive training.
- WDE must enter the result of the referral in MOJOBS in the Job Order Activities Tab. The WDE will create the obligation packet and will submit it to the CDE who will complete the Obligation Form and submit same to the Manager for approval. OJT forms include the following:
 - O-15 – On-the-Job Training Program Agreement, including Legal Certifications and On-the-Job Training Program Agreement General Assurances
 - O-17 – On-the-Job Training Skills Training Agreement
 - Case Note documenting employer, start date and participation in an OJT
 - Certificate of Insurance
 - Employer’s E-verify Exhibit, including a signed Current Business Entity Status form, a signed Affidavit of Work Authorization, and accompanying documentation of E-Verify status
- Attainment of skills documented in the training plan must be notated, and in the case notes, Monitoring Forms (Employer and Participant) and the Skills Training Agreement.

F. Contractors: Full Service Contractors shall directly enroll customers for training services, including on-the-job training and classroom occupational skill training but must follow Workforce Development Board approved procedures as outlined in this Issuance. Contractors who provide support services directly for their customers must follow approved procedures as outlined in this Issuance.

G. Measurable Skill Gains: Measureable Skill Gains that occur during the customer's program will be entered and case noted into MOJOBS by the counselor or provider attaining the information. The reader is referred to Issuance No. 2017-007, Measurable Skill Gains, for more information regarding this measure. Measurable Skill Gains must be uploaded into MOJOBS.

H. Supportive Services: Customers who attend on-the-job training may be eligible for supportive services such as work-related clothing, tools, and equipment and transportation for up to 30 days during the customer's first month of employment. Issuance 2001-08, Modification 25 provides additional information on supportive services available to customers. Supportive Services provided will be based upon the needs of the customer, and must be documented in the customer's Employment Plan.

Contractors: Full Service Contractors shall provide supportive services directly for their customers but must follow approved procedures as outlined in this Issuance.

I. Employer Agreement

- WDE will submit a copy of the completed Employer Agreement packet to the Fiscal Department
- The Fiscal Department will record the employer and notify the Fiscal Department to generate a Vendor ID
 - Only employers and vendors have Vendor IDs
- For employers without Employer Agreement packets, WDE will email employer address and contact information to MIS to be entered into the database.
- MIS will notify the Fiscal Department to generate a Vendor ID

J. Worksite Monitoring

During training, the WDE will complete at least twice a month the *OJT Worksite Monitoring Reports*, and submit to MIS for participant's file and uploaded in MOJOBS to document Measurable Skill Gains. Worksite monitoring will occur every two weeks. A case note summarizing the OJT Worksite Monitoring Report must be entered by WDE in MOJOBS real time. The monitoring will include participant training and corresponding employer payroll records if we are reimbursing. Monitoring should be performed whether or not reimbursement occurs. WDE will record OJT worksite monitoring in MOJOBS. The MIS Department will be notified to print and file in participant file.

Attainment of skills documented in the training plan must be notated in the case notes, and the Worksite Monitoring Report. WDE enters case note after the last day of training and upon the first day of unsubsidized employment, Business Team member completes a verification form and final monitoring report, and delivers it to a Skills Team member.

K. Employer Payment Requests

The Fiscal Department will record OJT payments.

- WDE will submit monthly payroll logs, post training plans, monitoring reports, and
- MOJOBS case notes that states the payment amount and the timeframe of the requested payment.

If an OJT has been identified for a participant the following steps are followed:

STEP 1: Identify occupation, skills to be learned and length of time for training and maximum dollar amount. The job referral is marked as hired and OJT Agreement FEC O15 and fiscal forms are completed. Specify the Specific Vocational Preparation (SVP) level.



STEP 2: Route OJT obligation (From Workforce Development Executive to Career Development Executive to Director or Program Manager, Financial Aid Service Specialist, to Officers for review and approval, to Financial Aid Service Specialist for uploading, and to Fiscal Department for processing and payment).



STEP 3: The Career Development Executive enters the OJT activity codes in MOJOBS.



STEP 4: After training complete final OJT forms and begin processing the reimbursement.



STEP 5: Deobligate funds not spent, as needed.

These steps are detailed below:

Step 1

On-The-Job Training Skills Training Agreement and Obligation Requirements: The OJT agreement should identify the occupation, the skills to be learned and the length of time the training will be provided and must be limited to the period of time required for a participant to become proficient in the said occupation for which the training is being provided.

The On-the-Job Skills Training Agreement must ensure that participants are provided a structured training opportunity in which to gain the knowledge and competencies necessary to be successful in the occupation in which they receive training. In determining the appropriate length of the training agreement, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's employment plan.

The **On-the-Job Training Skills Training Agreement** includes:

- The employer name and address
- The employer size
- Occupation
- Job Title
- The O*Net code
- The SVP Range (based on O*Net Code)
- Job order number
- Total number of hours working per week
- The duration of training with the start (must match actual OJT start date), and end date of training clearly defined
- The name of participant
- MOJOBS State ID and last 4 digits of Social Security number
- The rate of pay per hour
- The percentage of reimbursement
- The maximum amount of reimbursement
- Name or job title of person with the company who is responsible for training
- Job description
- A training outline that includes at the minimum six skills that will be obtained during the training that is addressing the gap in skills of the participant who is receiving the training. An estimate of the percentage of competency to be reached in each skill by the midpoint of the training and at the end of the training
- Signature of trainee and date
- Signature of employer/trainer and date
- Name of the Business Services team member generating the plan.
- Job Order number
- General Assurances, including the employer's agreement to maintain and make available time and attendance records, payroll, e-verify, and other records to support amounts claimed by the employer for reimbursement under the OJT agreement.

Obligation/Fiscal Forms – (WDE)

- On-the-Job Training Obligation/De-obligation Form
- O-17 – On-the-Job Training Skills Training Agreement
- O-15 – On-the-Job Training Program Agreement, including Legal Certifications and On-the-Job Training Program Agreement General Assurances

- Summary Screen – Must document activity enrollment
- Case Note documenting employer, start date (must match actual OJT start date), and participation in an OJT
- Copy of Certificate of Insurance
- Notarized Employer E-Verify Exhibit, including a signed Current Business Entity Status Form, a signed Affidavit of Work Authorization, and accompanying documentation of E-Verify status
- Memorandum to file, in cases where exceptions to policy have been requested and approved by Officers

At the end of the training period WDE provides to CDE a Verification of Placement and will enter a case note to document that the customer has completed their training and the employer has retained them.

Maximum Dollar Amount and Minimum and Maximum Time Periods: The maximum dollar amount to be paid for on-the-job training is **\$4,000.00**, and may only be exceeded by obtaining the written approval of the Manager, Officers' and President/CEO or designee. This amount is subject to budget availability, is NOT an entitlement, and will vary dependent upon training area. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding and must be submitted prior to the start of training. The amount of the OJT should not be communicated with the employer prior to approval of the OJT Obligation form. OJT participants must be employed at a minimum of 30 days before reimbursements are processed and/or provided.

Time Periods: The minimum time period is 4 weeks or 160 hours; the average time period is 8 weeks or 320 hours; and the maximum time period is 1,040 hours. However, the length of the OJT may vary based on three factors: the difficulty of the job, previous work experience, and the customer's education. Variances from the normal time periods require the approval of the President/CEO or designee.

In determining the appropriate length of the training agreement, consideration must be given to the skill requirements of the occupation; the academic and occupational skill level of the participant; prior work experience; and the participant's Employment Plan. The participant's length of training must be based on the gap of skills between the position and the OJT participant and be consistent with an overall WIB policy that enumerates training plans allowed maximum length. (e.g., O*Net and/or the Skills Training Agreement). Training must not exceed 1,040 hours.

The following is the conversion between the SVP Level of the occupation and the maximum weeks of training allowed for an OJT participant. An explanation of the various levels of Specific Vocational Preparation (SVP) from O*Net On-Line, found at: <http://www.onetonline.org/help/online/svp>. Identify the SVP level by going to the Job Zone section of the O*Net Online site. The O*Net profile for each occupation has an SVP level identified in the Job Zone section. The SVP level found in the Job Zone section should be entered on all OJT forms that request an SVP level. The maximum length of the OJT must be based on the SVP level of the occupation; the duration of the training does not determine the SVP level. The chart below illustrates the maximum allowable length of OJT based on the SVP Level. Although it is possible for an OJT to be of a shorter duration than the maximum length, the OJT cannot exceed the duration listed in the chart.

If the SVP Level is above 4 (4 and over), the actual SVP level should be entered on all forms that request an SVP level. In these cases, however, the training still cannot exceed the maximum duration of 1,040 hours.

SVP Level	Maximum Duration of OJT
1	Short demonstration only
2	Up to 1 month
3	Up to 3 months
4 and over	Up to 6 months = 1,040 maximum hours of training

Individuals in OJT shall be compensated at the same rates, including periodic increases, as trainees or employees who are similarly employed in similar occupations by the same employer; and, who have similar training, experience, and skills. Such rates shall be in accordance with applicable law, but in no event, less than the higher of the rate specified in Section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the applicable state or local minimum wage.

Step 2

Routing of OJT Obligations: The obligation packet is developed by the Workforce Development Executive and provided to the Career Development Executive for signature. The packet is forwarded to the Director or Program Manager for review and approval. The obligation packet is then forwarded to the Financial Aide Support Specialist who logs receipt of the packet for tracking and forwards the packet to the Officers for approval. Upon Officer approval, the packet is returned to the Financial Aid Support Specialist who forwards the packet to the Fiscal Department for processing and payment.

Step 3

MOJOBS: The CDE will enter the customer in the OJT Activity in MOJOBS when the obligation is submitted; this includes entering the Job order number in the Employment Plan. If customer does not start the activity, the activity will be closed and outcomes will indicate service in error. The OJT actual start date must match the start date listed in MOJOBS. **MOJOBS CODE – 428.**

Step 4

OJT Reimbursement Process and Extension Policy: After an OJT customer completes training, which is the total number of hours outlined on the training, the employer may be eligible for the wage reimbursement amount obligated on the training plan. The employer can be reimbursed one day after completion of the on-the-job training outlined in the training plan agreement.

The amount obligated for OJT shall not exceed \$4,000.00 without approval from the Manager, Chief Operations and Chief Financial Officers, and the President or designee. The amount of the OJT should not be communicated with the employer prior to approval of the OJT Obligation form.

Upon completion of OJT training, the original Skills Training Agreement will be signed by the customer and the employer. The WDE will submit a copy of the signed Skills Training Agreement along with the OJT reimbursement paperwork to the Manager for approval who will submit same to the Senior Vice President for approval and submission to Fiscal for payment.

The original reimbursement packet is to be submitted to Fiscal, and a copy maintained by the WDE. The **reimbursement package** must contain the following information:

- O-18 – On-the-Job Training Payment Request
- O-19 – On-the-Job Training Actual Cost Reimbursement Form
- Signed copy of O-17 – On-the-Job Training Skills Training Agreement
- Worksite Monitoring Report (to be completed by the WDE twice a month throughout the training period). The WDE should share the results of the monitoring with the CDE and make case notes.
- OJT Invoice – Completed and signed OJT invoices which indicate the actual hours worked to verify that all training hours have been completed. In the event the

participant is unable to sign a time sheet, documenting Service Notes should outline the attempts to secure signature. Employer attestation on the OJT Training Agreement of an electronic time management system to capture attendance accompanied with the payroll data may suffice in lieu of participant signature

- Client payroll documentation as provided by employer Payroll documentation reflecting gross and net wages. The actual training period reported on Payroll documentation must match with the training period on the training plan and pay must match at least the agreed upon hourly rate. Any difference between the actual training period and training period on Skills Training Agreement requires senior management approval.
- Case note stating Reimbursement packet is being submitted for payment OJT Training activities can be extended if requested by the employer. WDE must provide a written request and justification for the extension (i.e. to allow for additional time to obtain stated skills needed). The employee must be employed a minimum of 30 days before reimbursements are processed and/or provided.

Step 5

De-Obligation: If trainee did not complete training, the training must be de-obligated within 30 days of training end date and submitted with a copy of Form O-17 (On-the-Job Training Skills Training Agreement).

L. Additional Requirements for OJT Training

Dispute Resolution, Nepotism and Agreement Modifications:

- Should a company involved in an OJT have a dispute, the dispute will be referred to an Officer for clarification and resolution,
- Should a participant have a dispute with a company and/or if the dispute entails a claim of discrimination, the dispute will be resolved through a Director, in consultation with an Officer. Disputes involving discrimination will also be referred to the EEO Manager,
- An Employee Services Staff member shall not work directly with a company that has a connection with a relative at the company leadership level,
- Participants will not be placed when it is known that they have a connection with a relative at the company leadership level,
- Modifications of OJT Agreements shall be reviewed and authorized by an Officer of the Full Employment Council.

M. Employer Outreach

Employer outreach must for OJTs must consider the following:

- Outreach shall reflect the Full Employment Council's designation of high-demand occupations and employment sectors,
- An employer orientation must be performed, including training provisions, general assurances, training plan, participant monitoring and invoice procedures,
- Non-discrimination guidelines must be covered,
- It must be relayed that no reimbursement shall be made for work performed outside of the term of the Contract, or during periods of work stoppages, or for fringe benefits. We will not reimburse for holidays, sick time or overtime. Overtime hours in excess of 40 hours per week shall be counted as training hours and reimbursed at the regular rate of pay. The employer however, must pay the overtime rate in excess of the regular rate in full. "non-regular" wages such as shift differential, premium pay, are also reimbursed at the regular pay, if training occurs during those hours.

N. Recording Results of On-the-Job Training Activities in MOJOBS

It is important to select the correct OJT Training Service outcome because the outcome will effect Performance Measures on the local and state level. Only the following codes may be used:

- Did Not Complete;
- Non-OJT Related Employment;
- OJT Related Employment;
- Retained by OJT Employer; and or
- OJT-Did Not Complete.

VI. YOUTH PRE-APPRENTICESHIPS (MOJOBS code 433)

Pre-apprenticeship

Participants may be enrolled in a Pre-Apprenticeship if a Registered Apprenticeship Program has signed an Employment and Training Strategy that indicates there approval of the curriculum and work experience component. In addition they must agree to enable individuals who have successfully completed the pre-apprenticeship program to enter directly into a Registered Apprenticeship program and/or include articulation agreements for earning advanced credit/placement for skills and competencies already acquired. The class room training must be on the approved training provider's list and approved by the region. Pre-apprenticeships will focus on the targeted sectors of the region. The Employment Training Strategy must be approved by the Senior Vice President/Chief Operations Officer.

Pre-Apprenticeship occupations will be approved occupations in the sectors of Information Technology, Business and Financial Services, Healthcare, Advanced Manufacturing and Transportation and Logistics.