

	<b>Subject</b> Training Policy ARIZONA@WORK-Yuma County	
	<b>Original Issue Date</b> February 18, 2016	<b>Revision Date</b> March 18, 2024
	<b>Authorized by:</b> Yuma County Workforce Development Board	

**Background/Purpose:** This policy for the Yuma County Local Workforce Development Area (LWDA) provides guidance for training services available to unemployed and underemployed adults, dislocated workers, and youth participants through the Workforce Innovation and Opportunity Act (WIOA) Title I-B Programs. Training services prepare individuals for the workforce by providing in-demand skills that meet employers’ needs based on labor market information, local sector strategies, career pathways, and business outreach. Through job-driven training, individuals gain the skills needed to obtain, and or retain employment and increased earnings, which may lead to self-sufficiency.

**References:** WIOA of 2014 (P.L. 113-128), Federal Register 20 CFR 680, Training and Employment Guidance Letters (TEGLs) 19-16, 21-16,10-16 chg. 2, 23-19 chg.2 and WIOA Title I-B Training Services Policy Manual Chapter 2-Section 500, WIOA Title I-B Youth Program Policy Manual Chapter 2-Section 300, WIOA Title I-B Adult & Dislocated Worker Program Policy Manual Chapter 2-Section 100, WIOA Title I-B Informational Broadcast 21-007.

**Policy:**

**I. Training Services**

Training services are available to assist Adult, Dislocated Worker, and Youth participants in gaining skills and knowledge to obtain and retain employment. Training is administered by public and private sector employers, as well as institutions of higher education, Registered Apprenticeships (RA), and other public and private providers of programs of training services.

Training services must be tied to in-demand industries and occupations that will assist participants to enter the workforce. Training services provided to eligible participants must be directly linked to employment opportunities in the local area in which the participant resides or in another local area whether the participant is willing to relocate. The following training services are available through ARIZONA@WORK Yuma County:

- a. Occupational Skills Training
- b. On-the-Job Training (OJT)
- c. Incumbent Worker Training (IWT)
- d. Registered Apprenticeship (RA)

Equal Opportunity Employer/Program Auxiliary Aids and Services Are Available Upon Request To Individuals With Disabilities.

Other types of training services may be provided to Adults and Dislocated Workers as listed on WIOA Title I-B Training Services Policy Manual Chapter 2-Section 500.

OJT, IWT, and Customized Training are not required to be listed on the Eligible Training Provider List (ETPL) and are not subject to ETPL requirements.

The WIOA Title I-B Youth Program must make each of the 14 program elements available to eligible youth program participants. Of the 14 elements, Occupational Skills Training and Registered Apprenticeship qualify as training service for youth participants. **For the WIOA Title I-B Youth Program, OJT is a type of Work Experience, and not considered a type of training.**

## **II. Training Services Eligibility Requirements**

All Adults, Dislocated Workers, and Youth participants must be registered and enrolled in the Arizona Job Connection (AJC) State system and determined eligible for the WIOA Title I-B Program prior to receiving training services.

Service Providers must collect documentation for priority of service for adults and veterans/eligible spouses enrolled in the WIOA Title I-B Adult Program to receive training services. Refer to the WIOA Title I-B Adult Program Eligibility Checklist. Adult participants who are considered self-sufficient and exceeding the Arizona Department of Economic Security (DES) 200% Lower Living Standard Income Level (LLSIL) Income Matrix for Yuma County, must be fully assessed and approved by the Service Provider management staff to receive training services.

Service Providers who serve Dislocated Worker participants must use the WIOA Title I-B Dislocated Worker Eligibility Checklist to determine eligibility in the Dislocated Worker Program and collect required documentation.

Service Providers who serve Youth participants must use the WIOA Title I-B Youth Eligibility Checklist to determine eligibility into the youth program and collect required documentation.

### **Veterans and Adult Priority Groups**

The adult priority of service must be coordinated with the veteran's priority of service when individualized and training services are provided to Adult participants.

- a. First Priority: veterans and eligible spouses (covered persons) who are either recipients of public assistance, basic skills deficient or low income.
- b. Second Priority: non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for the adult program:
  - Individuals receiving public assistance, or has received public assistance in the last 6 months;
  - Individuals who are considered low-income; or

- Individuals who are basic skills deficient to include English Language Learners (ELLs).
- c. Third Priority: veterans and eligible spouses who are not recipients of public assistance, not low-income, or who are not basic skills deficient.
- d. Last Priority: all other persons not listed above, and those who do not qualify as veterans, eligible spouses, recipients of public assistance, low-income individuals, or basic skills deficient individuals.

**Note:** Service Providers are required to report and track on a monthly basis adult priority of service and veteran's priority of service for WIOA Title I-B Adult Program. In addition, veteran's priority of service is also tracked for WIOA Title I-B Dislocated Worker and Youth Programs. Report is submitted by the 15<sup>th</sup> of every month to the LWDB Compliance Staff.

### **Comprehensive/Specialized & Objective Assessment**

Adult and Dislocated Worker participants must be administered with the TABE 11-12 assessment test prior to receiving training services to determine the following;

- a. Participant is basic skills deficient, which in return is used to determine adult priority of service.
- b. Participant meets required educational training level as listed on the ETPL for the specific training program.

**Note:** If participant meets the First or Second Priority of service listed on Section II. of this policy as a recipient of public assistance or is low income; then participant is not required to be administered with the TABE 11-12 assessment test.

Youth participants must receive an objective assessment which includes a review of basic skills, occupational skills, prior work history, employability, interests, and development needs. The TABE 11-12 assessment test is administered to the participant as part of the objective assessment to determine basic skills deficiency; and if participant meets the required educational training level as listed on the ETPL for the specific training program.

Training services are available to employed and unemployed adults, dislocated workers, and youth participants when the Service Provider staff determines after an interview, evaluation or assessment, and career planning, that the participant is:

- a. Unlikely or unable to attain or retain employment that leads to economic self-sufficiency, or wages comparable to or higher than wages from previous employment, through career services alone;
- b. In need of training services to obtain or retain employment that leads to economic self-sufficiency, or wages comparable to or higher than wages from previous employment;

- c. Meets the educational qualifications to successfully participate in the selected program of training services as determined by reviewing previous work history, skills, and educational background;
- d. Selecting a program of training services from the ETPL list, directly linked to employment opportunities in the local area, the planning region, or another area to which the participant is willing to commute or relocate;
- e. Unable to obtain grant assistance from other sources to pay for the cost of training or requires WIOA Title I-B assistance in addition to other sources of grant assistance;
- f. A member of a worker group under a petition filed for Trade Adjustment Assistance (TAA) and is waiting for a determination. If the petition is certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA Title I-B Adult Program; and
- g. Meets the criteria and determined eligible according to the state and local priority of service system for the WIOA Title I-B Adult Program.

### **III. Required Career Services/Case File Documentation**

Participants must be assessed to identify their eligibility for training and Service Provider staff must obtain necessary information to determine participant is eligible to receive training services. Participants must receive at a minimum the following:

- a. An interview, assessment, or evaluation and career planning, including Development of an Individual Employment Plan (IEP) or Development of an Individual Service Strategy (ISS) for youth.
- b. Service Provider staff may use a participant's recent interview, evaluation, or assessment for training eligibility determination purposes when such is conducted by another education or training program.

Service Providers must have the following information documented and entered in AJC system:

- a. A determination of the need for training services as identified by an interview, assessment, or evaluation of participant's needs.
- b. Documentation on Career Planning services provided such as labor market information and training provider performance information.

- c. Any other career services provided to participant. **Note:** any basic career services provided to participant must also be entered under the Service & Training Plan (S&T plan) in AJC.

The “Eligibility Determination for Training Services” must be added to the S&T plan in AJC system when the following occurs: *(Does not apply to Youth Program)*

- a. The Service Provider has determined based on the Development of IEP, that participant is interested in training services; the “*Eligibility Determination for Training Services*” will be opened/closed in AJC with the same date as the Start Date of the Development of IEP service. If participant later on decides not to pursue training services, then a program note must be generated indicating the change as well as updating IEP; or
- b. If during the Development of IEP, the participant indicates that they are only interested in individualized services, yet participant results in receiving training services then the “*Eligibility Determination for Training Services*” will be opened/closed with the same date of the Start Date of the training service that is being provided.

#### **IV. Career Planning Consultations**

When participants are interested in receiving training services, Service Providers must provide a career planning consultation where an evaluation takes place and consists of the following:

- a. Reviewing participant’s assessment results to determine if skills are sufficient to successfully complete a selected training program;
- b. Have participant review the ETPL as part of the consumer choice when selecting training;
- c. Review program prerequisites;
- d. Discuss availability of additional training funds such as the alternative source of funding listed on Section VI. of this policy;
- e. Review the cost of the selected training program; and
- f. Availability of jobs by reviewing labor market information and the minimum entry wage for related occupations.

Career planning consultation must be documented in participant’s record through program notes in AJC system.

#### **V. Consumer Choice**

The LWDB through the ARIZONA@WORK Job Center must make available to customers the Local and State ETPL. The LWDB provides a full array of training options Equal Opportunity Employer/Program Auxiliary Aids and Services Are Available Upon Request To Individuals With Disabilities.

that assist participants advance along in a career pathway. Training programs listed on the ETPL that lead to a recognized postsecondary credential and are aligned with in-demand industry sector occupations must be given priority consideration.

Training services that are provided through an Individual Training Account (ITA) as discussed in Section IX. of this policy must be provided in a manner that maximizes consumer choice in selecting a training provider. Participants that are determined eligible for WIOA Title I-B training services may select any eligible training program listed on the State ETPL, or from another LWDB within the State ETPL **that is not available on the local ETPL**, but not until participant has had a career planning consultation with the Service Provider.

## **VI. Coordination of WIOA Title I-B Training Funds with other Grant Assistance and Co-Enrollments.**

Service Providers staff must coordinate funding arrangements and co-enrollments with ARIZONA@WORK partners and other entities. WIOA Title I-B funding for training is limited to participants who are:

- a. Unable to obtain other grant assistance to pay for the cost of training; or
- b. Who require assistance beyond that available from other sources to pay for training.

The LWDB has established a **limit of \$5,500** WIOA Title I-B funds to assist participants with training services. Service Providers must ensure that WIOA Title I-B training funds are only awarded when:

- a. No other sources of funding are available; or
- b. When the amount available is insufficient in covering the participant's training costs.

Service Provider staff must document in AJC system under program notes and IEP/ISS when alternative sources of funding have been applied. Some alternative sources of funding may be available, but not limited to:

- a. State-funded training funds;
- b. Trade Adjustment Assistance (TAA);
- c. Rehabilitation Act funds;
- d. Temporary Assistance for Needy Families (TANF);
- e. Federal Pell Grant funds; or
- f. Other federal grant funds

### **Note:**

- Student loans are excluded when determining the individual's overall need for WIOA Title I-B training funds for educational costs.

- Individual may be attending school when they become WIOA Title I-B participant; reimbursement of training costs **is not allowed** for payments made prior to WIOA Title I-B participation.
- For Veterans/Spouses the GI Bill or other forms of Veterans Administration (VA) education or training benefits does not apply and are not required to the coordination of their entitlement to VA training benefits with WIOA Title I-B training funds.

## VII. Pell Grant

Pell Grant eligibility takes place by completing the Free Application for Federal Student Aid (FAFSA). Federal Pell Grants are awarded to cover tuition costs and education-related expenses.

- a. Service Provider staff must document in AJC system when participant is eligible or non-eligible for Pell Grant and upload documentation supporting the eligibility determination and award of the Pell Grant.
- b. If a participant is attending a training program that indicates “*Pell Grant*” as the “*Type of financial aid offered or have access to*” as indicated on the ETPL screens of AJC, then the participant must apply for financial aid and service providers must obtain documentation indicating whether or not the participant is eligible and awarded for Pell Grant. If a participant is attending a training program that indicates “*NA*” as the “*Type of financial aid offered or have access to*” as indicated on the ETPL screens of AJC, then the participant is not required to apply for financial aid.
- c. A participant is able to enroll in WIOA Title I-B funded training while FAFSA application is pending.
- d. Once the award of the Pell Grant has been given, the Training Provider must reimburse the Service Provider the amount that the Pell Grant covers from the WIOA Title I-B funds used to underwrite the training.
- e. Service Providers must have an agreement on file with the educational institution/training provider and the participant before any funds are paid to the training provider. The agreement must indicate the amount to be initially paid by the Service Provider and agreement between the training provider and the participant to reimburse the Service Provider through the Federal Pell Grant.
- f. When participant is awarded with a Pell Grant, the amount of the grant must be recorded along with the beginning and ending of the grant in AJC system under Enrollment Details in the Educational Grants Link; as well as documented in program notes. Refer to AJC Data Entry Procedures/Requirements Document.

## VIII. Co-Enrollments

- a. Co-enrollments are established when participant is receiving services from other partner programs to allow leveraging of funds, and expand services available to

participant to meet their needs. Service Providers must be certain that duplication of services does not occur when working with participant.

- b. Co-case management needs to be documented in AJC system under program notes when participant is co-enrolled with other partner programs to assure the success of participant in the program.
- c. Supportive Services may be provided to participant when training is WIOA Title I-B funded or non-WIOA Title I-B funded. Any supportive services provided by the Service Provider must be documented appropriately under program notes, IEP/ISS, and service recorded in the S&T Plan of AJC system. Refer to the local Supportive Service Policy for Adults, Dislocated Workers, and Youth participants. **Note:** if supportive services are being paid by partner program or non-WIOA funds, service must be entered under Partner Provided Service Link in AJC.
- d. When non-WIOA Title I-B funds are used to pay for training, the training program is not required to be listed on the ETPL.
- e. If the training is paid for using partner-provided funds or funds such as the ones listed below, the training service must be recorded under the Partner Provided Service link in AJC. Refer to AJC Data Entry Procedures/Requirements document. This is required to be documented in AJC system under program notes and IEP/ISS.
  - Federal Pell Grant;
  - Social Services Block Grant (SSBG);
  - Other grants or scholarship; or
  - Participant, employer, or participant's parent paying for training.

**Note:**

- Adult and Dislocated Worker participants whose education or training is paid by a partner program or non-WIOA Title I-B funds will not be included in the Credential Attainment Rate; unless participant enrolls in a second education or training service paid by WIOA Title I-B funds. *(Does not apply to Youth participants)*
- Adult and Dislocated Worker participants will be included in the Credential Attainment Rate only when the education or training is fully or partially funded by WIOA Title I-B funds. *(Does not apply to Youth participants)*

Refer to the AJC Data Entry Procedures/Requirement document for recording credentials in AJC system.

## **IX. Individual Training Account (ITA)**

Service Providers must use ITAs to provide training services authorized under WIOA Title I-B program to eligible Adults and Dislocated Worker participants to pay and attend approved training program listed on the ETPL.



This LWDB has also established the use of ITA's for In-School Youth (ISY), and Out-of-School Youth (OSY) for occupational skills training services listed on the ETPL.

The ITA must be justified through documentation of the participant's need, such as occupational choice, goal, and the level of training needed to succeed in that goal, as identified in the IEP/ISS; as well as labor market information that is relevant to the training documenting the reasonable expectation of high-pay/high demand employment upon completion of the training in a sector strategy area.

The LWDB has established a limit to the ITA of **\$5,500** WIOA Title I-B funds to assist participants with training services.

- a. An ITA is a payment agreement established on behalf of the participant with the training provider so the participant can purchase training from a training provider whose program is listed and approved on the ETPL.
- b. It is also an agreement between the Service Provider and the Training Provider.
- c. Service Providers will not require the participant to pay for the training upfront and request reimbursement upon completing the training.
- d. Service Providers are only responsible for the amount agreed upon in the ITA.
- e. ITA payments are paid out by the Service Provider's Fiscal department to the Training Provider based on the contract tuition invoicing that is established between the Service Provider and Training Provider as listed on the ITA document. The following back-up documentation is required for payments to be issued:
  - ITA;
  - Invoice;
  - Proof of attendance;
  - Copy of credential; and
  - Participant's AJC Enrollment Details print-out document
- f. The ITA amount cannot exceed the total training cost listed on the ETPL.
- g. The participant may select a training program that costs more than the maximum amount available for ITAs when other sources of funds are available to supplement the ITA.
- h. Each training program requires an individual and separate ITA.
- i. When an ITA is issued, the ITA information must be recorded in AJC system under the Educational Grants Link. Refer to the AJC Data Entry Procedures/Requirements Document.
- j. ITA form is generated through the local Integrated Service Delivery System/Contracts & Reports Database (ISDS), and uploaded into AJC system. The ITA form must contain the following information:

- Name and address of Training Provider
- Participant's name and ID #
- WIOA Funding Source
- Type of training program and correspondent Occupational Information Network (ONET Code)
- Start date and estimated end date of training
- Total cost of training program including contract tuition invoicing, supplies, books, and any fees.
- Pell Grant Eligibility/Award Amount if applicable
- Must be signed and dated by participant, Service Provider, and Training Provider on the day the training begins or prior.
- An amendment to the ITA is required when changes are being made to the original ITA submitted. (e.g. if the participant's actual end date of training goes beyond 30 days from the estimated end date listed on the ITA, an amendment to the ITA will be required to show the estimated end date being revised.)

**Note:** A 3<sup>rd</sup> party billing form may be used to procure training services at the community college level for Pell Grants.

## **X. Arizona Reciprocal Agreements**

Service Providers may refer participants to training programs listed on another state's ETPL with which Arizona has a reciprocal agreement. Arizona has agreements with the State of Nevada, Utah, New Mexico, Missouri, and Montana.

The training provider and program information must be manually entered on the S&T plan in AJC system and "Reciprocal Agreement with the State abbreviation," must be entered under the Training Agent ID field (*i.e.* "Reciprocal Agreement with NM").

Program notes and IEP/ISS must indicate participant is receiving training services from another state besides Arizona. Service Providers are required to have regular contact with training provider to follow up on participant's progress.

## **XI. Occupational Skills Training**

Occupational skills training for WIOA Title I-B Adult, Dislocated Worker, and Youth participants is an organized program of study designed to provide specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupational field at entry, intermediate, or advanced levels.

- a. Service Providers must ensure participant is selecting a training provider/training program from the ETPL that is "WIOA Approved."

- b. Service Providers must consider priority on training programs that lead to recognized post-secondary credentials and that they align to in-demand industry sectors and occupations as described in the local plan.
- c. Training must be outcome-oriented and focused on the occupational goal specified in the IEP/ISS.
- d. Participants are required to complete an Occupational Research Packet to determine if the chosen training program meets their needs and expectations.
- e. Service Providers will verify participant meets the specified training program qualification that is required by the training provider prior to starting the training program.
- f. Service Providers must not provide more than one occupational skills training to a participant during their WIOA program participation, unless justification is documented in AJC system under program notes and approved by the Service Provider management staff.
- g. Participant's progress as well as any intervention/guidance provided will need to be documented by the Service Provider in AJC system under program notes and the IEP/ISS.
- h. Occupational skills training paid by WIOA Title I-B funds must be entered and recorded in the participant's S&T plan in AJC system in a timely manner. Refer to the AJC Data Entry Procedures/Requirements Document.
- i. Participants receiving occupational skills training paid by WIOA Title I-B funds must have a client budget and payments entered in the S&T plan in AJC system. This will calculate and report the "Cost Per Participant" for ETPL annual performance reporting. Refer to the instruction handouts on how to create client budget and adding payments in AJC system.

## **XII. On-The-Job Training (OJT)**

- a. An OJT is provided under a contract with an employer in the public, private non-profit, or private who is reimbursed 50% of the wage rate of the participant being trained while engaged in productive work in a job to help them prepare for long term unsubsidized employment.
- b. OJT Contracts may also be entered into with Registered Apprenticeship (RA) program sponsors or participating employers in RA programs for the OJT portion of the RA program.
- c. OJT contracts may be provided to eligible employed workers if the employee is not earning a self-sufficient wage as listed on the 200% of the LLSIL for a family size of 1. The employee must learn new technology, introduction to new production or service procedures, or upgrading to new job duties that include the need to increase workplace literacy.

- d. The LWDB gives the authority for Service Providers to contract with neighboring States to provide OJT Training; this will be considered on a case by case basis and approved by the Service Provider management staff.
- e. An OJT contract is limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. The required skills of the occupation, academic level of the participant, and prior work experience are taken into consideration in order to determine the appropriate length of the contract.
- f. Service Provider will determine after an interview/evaluation and or assessment that the participant is in need of training to obtain or retain employment that leads to economic self-sufficiency, or wages comparable or higher to wages from previous employment.
- g. Prior to the beginning of the OJT, participant is required to complete the Occupational Research packet. The packet will assist in researching the chosen occupation using online resources, and interviewing potential employers in the selected profession.
- h. The occupation listed on the OJT contract must be tied to an in-demand occupation in the local area.

#### **Employer Information Form:**

An Employer Information Form consists of questions that pertain to Title I-B program requirements; and is required to be completed by the employer to determine if the setting/employer is suitable as a provider prior to the placement of an OJT agreement contract.

- a. Service Providers must verify in ISDS/Contracts & Reports Database if the form for the selected employer has been obtained, and is up-to-date before initiating the OJT contract.
- b. The form must be completed along with any required back-up documentation, signed/dated by Service Provider staff, and approved/denied by the Service Provider management staff.
- c. Form is to be submitted to the LWDB Compliance Staff annually or when employer information has changed.

#### **OJT Limits:**

- a. OJT contracts **may not exceed the total of 1040 hours.** **Note:** It is not a requirement to establish the OJT contract for 1040 hours.
- b. An OJT is only to be given to the participant on a one time occurrence throughout program participation.

- c. The LWDB has authorized to reimburse employers **up to 50 percent of the hourly wages on the OJT Contract with a cap of \$7,000 per participant contract.**
- d. The **maximum total amount awarded to employers per fiscal year is \$40,000** as approved by the LWDB.
- e. The LWDB staff has the option to approve additional funds based on the organization's extraordinary ability to impact job seekers. The following items will be taken into consideration in determining an organization's impact and request for additional funding:
  - The Characteristics of the participants, by taking into consideration whether they are "individuals with barriers to employment", as defined in WIOA sec. 3(24)
  - The size of the employer, with emphasis on small businesses
  - The quality of the employer-provided training and advancement opportunities
  - OJT contract is in an in-demand occupation, and other factors that DES, LWDB staff determine appropriate including:
    - a. The number of employees participating;
    - b. The wage and benefit level of the employee (both presently and completion); and
    - c. The relation of the training to the occupational competitiveness of the participant.

**Note:** Staff must document the factors in the participant's program notes and Individual Employment Plan (IEP).

### **Generating OJT Contract:**

The OJT contract is comprised of the required identified elements and generated through the ISDS/Contracts & Reports Database:

- Participant name and ID Number;
- Funding Source;
- Name, address, and phone number of employer worksite;
- Employer ID Number (EIN) ;
- The authorized representative of the employer. *(Usually the CEO, owner, or manager of the business. It could also be the Human Resource representative for an employer);*
- The supervisors working with the participant;
- Job Title assigned by the employer to indicate the position the participant will be trained for;
- The Occupational Information Network (ONET Code) which best describes/matches the job skills participant will be acquiring. *Service*

Provider will search the ONET Code through the online website:  
<https://www.onetonline.org/>

- The North American Industry Classification Code (NAICS Code) which is associated to the type of industry the OJT is being established in. Code must be 6 digit codes. Service Provider will search the NAICS Code through the online website: <https://www.naics.com/search/>
- The Specific Vocational Preparation Code (SVP Code) which measures the required level of specific occupational training and experience. The SVP Code rating will be displayed on the Job Zone section when utilizing the ONET online website;
- Hours authorized and the time frame for the OJT. **Note:** *hours per week cannot be less than 35 hours unless the participant is also attending school.*
- Worksite setting should be in person for OJTs;
- Hourly Reimbursement Rate and Estimated Contract Cost. *(this is the amount the service provider will reimburse the employer for the OJT, cannot be more than 50% of the starting wage);*
- Start and End Wage amount. *(Wage amount is negotiated between the service provider and the employer. Must consider participant's previous work experience and wage amount. Negotiated wage amount must not be less than what participant was earning.);*
- Mailing Address if different from physical address;
- 8 skills must be listed on the OJT Training Plan provided by the employer with the amount of hours it requires the participant to become proficient on each skill. Skills should be discussed with participant and employer prior to or on the start date of the OJT;
- Contract must be signed and dated by staff and employer prior to or on the start date (*1<sup>st</sup> day of work*) of the OJT. Cannot be signed after the first day of work. This includes completing the pre-assessment section of the training plan and indicating “Marginal” on all skills listed; and
- OJT Contract must be uploaded into AJC system. Service Providers must provide copy of contract to participant and employer.

### **Additional OJT Documents:**

- a. OJT supervisor and participant handbooks must be reviewed and provided by the Service Provider to participant and employer prior to the start date of the OJT.
- b. Contract Signature Sheet must be signed/initialed by participant, employer supervisory staff included on contract, parent/guardian signature (*if participant under age*), and Service Provider staff. Form is to be uploaded in AJC system along with OJT Contract.
- c. The Summary Policy Statement “Drug Free Workplace” document must be signed by participant and parent/guardian (*if participant under age*). Document will be uploaded in AJC system.

### **Monthly OJT Timesheet:**

- Completed by the Service Provider and employer;
  - Participant evaluation must be completed by employer. If poor evaluation, employer must provide comments and intervention must be provided by the service provider to address issue;
  - OJT timesheet generated through the ISDS/Contracts & Reports Database;
  - Submitted by the 5<sup>th</sup> of every month to the fiscal department of each Service Provider;
  - Signed and dated by the employer, participant, and case manager;
  - Signed by the fiscal department staff certifying performance is satisfactory for payment purposes; and
  - Back up documents along with monthly timesheet includes the W-9 Form, copy of OJT Contract, and participant timesheets used by the employer to track time (*i.e. time clock card, sign-in sheet, etc.*).
- 
- If participant or employer fails to continue the contract through the first ten (10) days, the contract will be void resulting in non-compensation to the employer and the participant's salary for the ten (10) days will be the expense of the employer.

### **OJT Training Plans:**

- a. OJT training plans are required to be completed by the employer on a monthly basis until the participant completes the OJT contract. OJT Training Plans are used for evaluation purposes to determine if participant has made any progression on assigned skills providing a rating from “marginal” to “adequate” or “proficient” on each identified skill. Monthly OJT training plans must be uploaded in AJC system.
- b. Post Assessment section of the OJT Training plan is completed when participant ends OJT contract. This section is signed and dated by employer and participant. Post Assessment training plan must be uploaded in AJC system.

### **Recording OJT in AJC System:**

- a. OJT service must be recorded in AJC system under the S&T Plan. Refer to the AJC Data Entry Procedures/Requirements.
- b. Service providers must document progress throughout OJT participation in program notes and IEP/ISS.

### **Note:**

- For the WIOA Title I-B Youth Program, OJT is a type of Work Experience, and not considered training.

- If a WIOA participant is under an OJT contract and another WIOA participant is placed through a WEX/Internship contract at the same location; the participant under the OJT contract is not permitted to supervise in any way another WIOA participant.

### **XIII. Registered Apprenticeship**

A Registered Apprenticeship Program is a training that has been approved on a set of National Guidelines for Apprenticeship Standards. It is developed by a national committee or organization which includes a combination of OJT and related technical instruction in a classroom instruction setting approved by the State of Arizona, sponsored by employers, employer associations, and jointly by management and labor. Registered Apprenticeships include a minimum of 2000 OJT hours and 144 hours a year of related technical instruction (RTI) where the apprentice is progressively increasing their skill levels and wages. Refer to Local Procedures for Registered Apprenticeship Training Program.

### **XIV. Incumbent Worker Training (IWT)**

Incumbent Worker Training is to assist local employer's workforce to obtain the skills necessary to retain employment and prevent job loss. Training is carried out by the LWDB in conjunction with employers or a group of employers (which may include employers in partnership with other entities for delivering such training).

#### **IWT Requirements:**

- a. Individual must already be employed by the employer at the start of the IWT.
- b. The IWT is managed with a commitment by the employer to retain or advert the layoff of the incumbent worker trained.
- c. IWT is not permitted in providing occupational training to a new hire.

#### **Employee Eligibility Requirements:**

- a. Individual must be employed prior to the commencement of IWT;
- b. Meet the Fair Labor Standards Act for an employer/employee relationship; and
- c. Must have an established work history with the employer for at least six months before commencing the IWT. Exception would be when training is being provided to a group of employees; not every employee is required to have the established six months of work history if the majority meets the employment history requirement.
- d. Employer is required to provide documentation verifying the employees participating in IWT have an established six-month work history. The information must be documented and entered by the Service Provider staff in the AJC system under the Work History tab located in the Case Details page of the individual's AJC account at time of registration. This requirement is also part of the contractual agreement between the LWDB and employer when initiating the IWT.

#### **Note:**

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- Individual must be registered and have an account in AJC system to collect demographic and performance data that is reported to the State and DOL. The AJC system will prompt a link for “*Incumbent Worker Enrollment*” based on the response to the question, “*Are you employed and in need of additional training at your place of employment?*” that is part of the demographic section of AJC system.
- Individuals who are only receiving IWT are not required to meet WIOA Title IB eligibility requirements unless they enroll into the WIOA Title IB Adult or Dislocated Worker program to receive career and training services.
- IWT is a business service. Individuals who only receive IWT are not included in the WIOA performance indicator calculations. However, it is still a State and DOL requirement for Service Providers to collect and report performance data on these individuals.

### **Employer Eligibility Requirements:**

The following factors will be used to determine if employer is eligible for IWT.

- a. The relationship to the occupational competitiveness of the employer and the employees;
- b. Number of employees participating in the training;
- c. The wage benefit after completing training (i.e. wage at the beginning of training and wage expected at completion of training);
- d. Credentials and skills gained as a result of the training;
- e. Employer size; and
- f. IWT aligns within the industry sectors and occupations in demand as described in the local plan.
- g. Must be current in unemployment insurance and worker’s compensation taxes, etc.

### **Note:**

An employer **will not** be eligible to receive WIOA IWT training funds if;

- The employer has any other individual on layoff from the same or substantially equivalent position.
- The IWT would infringe upon the promotion of or displacement of any currently employed worker or a reduction in their hours.
- The same or substantially equivalent position is open due to a hiring freeze.
- The positions are for seasonal employment.
- The position is not full time (i.e. minimum of 35 hours per week).

### **Additional Employer Criteria:**

The employer will provide and agree to the following conditions listed below;

Equal Opportunity Employer/Program Auxiliary Aids and Services Are Available Upon Request To Individuals With Disabilities.

- a. The Employer Information/Incumbent Worker Training Form must be completed by the employer and be submitted to the Service Provider to determine if employer meets Incumbent Worker Training requirements prior to the establishment of the IWT contractual agreement.
- b. Employer will adhere to applicable WIOA Title IB administrative requirements as well as the nondiscrimination and equal opportunity provisions of the laws.
- c. Provide a copy of the training course syllabus/outline that identifies the training need and competencies that will be achieved for the selected individuals to receive the training.
- d. Provide copies of a “Certificate of Completion” and credential attained on those who successfully complete the training program.
- e. Continue to employ an individual upon successful completion of training.
- f. The occupation must be a full-time permanent position following the training (minimum of 35 hours per week)
- g. At the time of the completion of the IWT, employee’s wage must increase as a result of the IWT.
- h. Be available for program monitoring on a scheduled basis.

### **Employer Contractual Agreement:**

Service Providers must conduct an employer orientation with the employer representative to discuss the contract provisions and deliverables. The LWDB authorizes a maximum contract amount of not more than **\$10,000** per company for IWT. Additional funds beyond the maximum contract amount are at the discretion of the LWDB staff.

The duration of the IWT must be limited to the time necessary for an individual to become proficient in the occupation for which they are receiving IWT. The IWT shall be no more than 6 months. Service Provider will consult with employer and use the ONET Online and view the Specific Vocational Preparation (SVP) to determine the appropriate length of training needed. An IWT contractual agreement **must not** be generated for low skill jobs that generally would require little or no training.

The IWT contractual agreement requires signatures of both the employer representative and Service Provider staff prior to or the 1<sup>st</sup> day of training. Training cannot begin until contract has been signed by all parties. The Service Provider staff will conduct an in person monthly employer onsite visit to verify the training progress and answer any questions employer or participant might have.

It is the responsibility of the employer to work with employee and ensure their training needs are met. In the event that the employee fails to attend training, quits, or is terminated; the employer must inform the Service Provider staff immediately.

### **Training Funds**

The Service Providers may reserve up to 20 percent of total adult and dislocated worker allocations for IWT through the approval of the LWDB staff. The 20 percent must only be used for IWT activities that are programmatic in nature.

### **Non-Federal Share/In-kind Contributions:**

Employer is required to pay a significant portion of the cost of training for those individuals receiving Incumbent Worker training. Fairly evaluated in-kind contributions are considered as part of the non-federal share cost. In-kind funds are defined as hourly wages paid to the individuals while they are in training.

WIOA Incumbent Worker funds may **not** be used to pay for the wages of workers being trained. Funds provided under this program may be used for the cost of providing the training.

The non-federal share depends on the size of the employer and must not be less than:

- a. 10% of the cost for employers with not more than 50 employees;
- b. 25% of the cost for employers with more than 50 employees, but not more than 100 employees; or
- c. 50% of the cost for employers with more than 100 employees.

### **AJC Data Entry Requirement:**

- a. **AJC Account-** Individual must have an account and be registered in AJC by completing all demographic information required in order for the Incumbent Worker enrollment to be generated in AJC.
- b. **Eligibility Application-** Service Provider staff will generate the IWT Eligibility application in AJC. Must be approved, dated, and signed by designated staff; and signed/dated by participant.
- c. **Program Notes-** Service Provider will generate program notes to document individual's progress during the training. *(One program note per month)*
- d. **S&T Plan-** The Incumbent Worker service is required to be entered under the S&T Plan in AJC when individual begins training. Refer to the AJC Data Entry Procedure Requirement document.
- e. **MSG-** A type of measurable skill gains must be set when participant begins the IWT. Refer to the Local Measurable Skill Gains Policy.
- f. **Outcomes-** 4<sup>th</sup> Quarter Outcome screen is required to be completed regardless if participant obtains a credential.
- g. **Exit Questions-** Exit Questions will be completed when participant completes the IWT service *(Note: the exit date is the last date of training as indicated on the IWT Contractual Agreement)*
- h. **Employer Contact-** Contact made with the employer to provide information about the IWT and to initiate the IWT Service is required to be recorded under the Employer Contact link.

### **Follow Up:**

Equal Opportunity Employer/Program Auxiliary Aids and Services Are Available Upon Request To Individuals With Disabilities.

Monthly follow up contact is required for those participants who only receive IWT services. Employer is required to provide verification of employment for those participants who received IWT for performance data.

**Data Validation Requirements:**

The Participant Individual Record Layout (PIRL) requires specific data elements be reported for participants that only receive IWT service. Please refer to TEGL 23-19 Change 2 and TEGL 10-16 Change 2 for a list of required data elements for IWT and their primary collection method. Any information or documentation relevant to the required data elements identified the TEGL's above must be entered or uploaded in AJC.

**Performance:**

In accordance with DOL and State requirements, Service Providers under the LWDB are still required to report and collect performance data on individuals who only received IWT service to calculate the primary indicators of performance for IWT projects separately from State performance. To reduce the reporting burden on employers, the LWDB encourages the collection of Social Security Numbers (SSN) as part of the IWT contractual agreement with the employer. If participant declines the provision of a SSN, the participant is required to provide a self-verification or employment verification. For all participants where an SSN is collected, the Service Provider will conduct a wage match through the AZ UI Wage Guide System to obtain their employment and earnings.

- a. Employment Rate (2<sup>nd</sup> Quarter After Exit)
- b. Employment Rate (4<sup>th</sup> Quarter After Exit)
- c. Median Earnings (2<sup>nd</sup> Quarter After Exit)
- d. Credential Attainment
- e. Measurable Skill Gains