
GST MICHIGAN WORKS! POLICY 18-06

(Board Approved 3-9-2018)

TO: Chief Executive of Subrecipients and Agency Staff

FROM; Jody Kerbyson, CEO

SUBJECT: WIOA Work Based Training

EFFECTIVE: Feb 1, 2018

PROGRAMS: WIOA Adult, Dislocated Worker & Youth

RESCISSIONS: N/A

REFERENCES: Workforce Investment Opportunity Act Manual (WIOA)

BACKGROUND:

Work-based training is employer driven with the goal of unsubsidized employment after participation. Usually, work-based training involves a commitment by an employer to fully employ successful participants after they have completed the program. Work-based training can be an effective training strategy that can provide additional opportunities for participants and employers in both finding high-quality workers and in developing a high-quality workforce. Customized training, OJT, incumbent worker training, and Registered Apprenticeships are all identified as work-based training services. Each of these work-based training models can be effectively used to target jobseeker and employer needs.

POLICY:

This policy outlines the various types of work-based training that maybe used in the region and the method of executing them. Work-based training shall be classified as Customized Training, On-The-Job Training, Incumbent Worker Training and Registered Apprenticeships.

Customized Training

Customized Training is not offered as a training component through GST Michigan Works! at this time. In the event, that we decide to offer this service, a specific policy would be developed.

On-The-Job Training

On-the-Job Training (OJT) is training by an employer in the public, private non-profit or private sector given to a participant who has been determined to benefit from this type of training in accordance with a participant's skill sets. The participant has been referred to and hired by the employer, following the development of an agreement with the employer to provide occupational training in exchange for reimbursement of the employer's extraordinary costs. On-the-Job Training occurs while the participant is engaged in productive work which provides knowledge and skills essential to the full and adequate performance of the job. OJT will be provided to those who can benefit from and are most in need of such services within the GST Michigan Works region.

GST Michigan Works! has an On-The-Job Training Policy that addresses the terms and conditions in which this program will be provided in our region.

The On-the-Job Training contract will be divided into two parts. The first part of the On-the-Job Training sets the ground rules for OJT with an employer and functions as a nonfinancial agreement between the employer and GST Michigan Works! The Master Agreement and the Pre-Award Certification will be utilized to lay out the ground work for the terms and conditions that will govern the OJT experience.

The second part of the OJT contract is the training plan, outlining the planned training activities to be accomplished during the training period. This constitutes a financial obligation between GST Michigan Works! and the employer. This document also serves as the authorization for the reimbursement of the agreed upon amount upon successful completion of the training plan and the retention period. The training plan will include the start and estimate end date of training, the training hours allowed, the hourly wage, O'Net Code, the tasks that will be learned and the method of instruction and evaluation. Each training plan will be individualized according to the trainee's skill sets and limited in duration to the time necessary for the participant to become proficient.

The training plan will be developed jointly with the employer and the trainee. The employer will furnish a job description outlining the skills necessary for the job. The Business Services Representative from GST Michigan Works! will utilize the O'Net Code, the participant's work history, level of job difficulty, academic and occupational skill levels to assess the required training hours needed for training.

The Business Services Representative will be in communication with the employer and trainee to accurately identify skill gaps. The Business Services Representative will complete a written justification with the OJT to explain rationale on all training plans. Employers will evaluate the trainee using the Completion Invoice, at the end of the training hours to ensure the trainee mastered 80% of the tasks.

A participant must be WIOA eligible as low income or have documented barriers to employment that would make them eligible for WIOA funding. Employed participants not earning self-sufficient wages must meet GST Michigan Works! WIOA eligibility guidelines to have an On-the-Job Training contract be written with a new employer. The participant will be assessed, on their prior work experience, occupational skills, academic and specific job skill requirements. A need for training through On-The-Job Training must be established.

Once the training plan is executed, monitoring will be conducted to ensure the trainee is on track and to determine if any intervention is needed. At the completion of the training, time and attendance along with payroll records will be collected as documentation of hours. An evaluation on whether the trainee has mastered the tasks will be assessed. Reimbursement of On-The-Job Training payments will be in accordance to On-The-Job Training policy.

Incumbent Worker Training

Incumbent Worker training is designed to ensure that employees of a company can gain the skills necessary to retain employment or avert a layoff and must increase both the participant's and a company's competitiveness. An ideal Incumbent Worker training is one where a participant acquires new skills allowing the participant to move into a higher skilled and higher paid job within the company, thus allowing the company to hire a jobseeker to backfill the incumbent worker's position. Incumbent Worker training is designed to meet the special requirements of an employer (including a group of employers in partnership with other entities) to retain a skilled workforce, or to avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

To qualify as an incumbent worker, the incumbent worker needs to be employed, meet the Fair Labor Standards Act requirements for an employer-employee relationship, and have an established employment history with the employer for six months or more. An incumbent worker does not necessarily have to meet eligibility requirements for career and training services for adults and dislocated workers under the WIOA.

GST Michigan Works! has a local policy "Layoff Aversion Strategies and Policy Guidelines for Incumbent Worker Training (IWT) programs" that addresses the terms and conditions in which this program will be provided in our region. This policy includes a description of local and/or regional layoff aversion strategies and services being utilized in our region. It addresses the requirement of using Incumbent Worker training as part of the demand-driven strategy. It provides information that only skill attainment activities, can be utilized for participating workers. Definitions of "at risk" indicators are also included in the policy.

Business Services Representatives from GST Michigan Works! will conduct fact finding sessions with employers to determine "at risk factors". A Company Profile, Assessment and Training Plan is completed as a single point of reference to establish that the company is at risk. It will document the "at risk" factors and worker eligibility. Once an "at risk" determination is made, the option of an Incumbent Worker training may be pursued. Employers will have an active role in helping to determine what training is needed. The training plan will provide information as to the specific training that is needed. Training does not need to be an ITA training, but Business Services Representatives will need to look at program cost comparisons to determine the appropriateness. The goal is to increase the employee's skill sets necessary to be retained or to avert a layoff, while increasing the company's competitiveness.

The employer, or group of employers, must pay for a portion of the cost of providing the training to incumbent workers. The portion of the training cost is the non-federal share of the cost of providing the training. Employers are required to contribute their share of the training costs.

Registered Apprenticeships

Registered Apprenticeship is a national training system that combines paid learning on-the-job and related technical and theoretical instruction in a skilled occupation. Registered Apprenticeships offer jobseekers immediate employment opportunities that usually pay higher wages and offer continued career growth.

Certifications earned through Registered Apprenticeship programs are recognized nationwide as portable industry credentials. The primary apprenticeship certification is a certificate of completion, awarded at the end of the apprenticeship. Many programs also offer interim credentials and training certificates based on a competency model that leads to a certificate of completion.

GST Michigan Works! recognizes the need to promote Registered Apprenticeship opportunities into the workforce system as a means of leveraging resources to better serve regional needs. In an effort, to support nationally recognized apprenticeships we will:

- Include apprenticeship training as a workforce strategy in the WIOA regional and local plans as a workforce solution for growing skills in targeted industry sectors.
- Engage businesses through encouraging the development of new registered apprenticeship programs as a solution to meet skill trades need for qualified people.
- Promote apprenticeship opportunities for students into local school districts, alternative education programs, adult basic education programs, prisons, and city, county, and state governments.
- At the One-Stop center level, promote apprenticeship opportunities to participants seeking careers in skill trades.
- Encourage partnerships and exploration of opportunities for leveraging existing workforce system funds with other funding sources to support and advance apprenticeship models.

For participants who are determined eligible for WIOA funds, GST may offer the following:

- Apprentice Readiness training, such as NATBU Multi-Craft Core Curriculum instruction or remediation and/or basic job skills training, to prepare an individual for a Registered Apprenticeship program.
- Pre-apprentice training that is part of and who's training hours are being counted toward an approved USDOL Registered Apprenticeship.
- Case management, prior to, and during a Registered Apprenticeship program.
- Work-based learning assistance (On-the-Job Training), in the form of employer reimbursement for the extraordinary costs of training.
- Assisting with Related Technical instruction in the form of tuition assistance, books, supplies, etc., when the training provider is on the approved list of eligible training providers.

Individual Training Accounts (ITA's) may be used to support the related instruction portion (e.g. classroom and distance learning portion) of their Registered Apprenticeship training. Registered Apprenticeships automatically qualify to be on a state's eligible training provider list. ITAs are only available to eligible individuals who are unable to obtain grant assistance from other sources to pay for education and training.

GST Michigan Works! has limited exceptions to provide training through a contract for services rather than ITAs. These exceptions include work-based training programs such as OJT or IWT, and in instances where it would be most appropriate to award a contract to an institution of higher education or other eligible provider to facilitate the training of multiple individuals for demand occupations.

On-the-Job Training opportunities with registered apprenticeships present difficulty in providing due to the length of time. On-the-Job Training may be provided through GST Michigan Works! if an apprenticeship can be divided up into stackable credentials.

All Work Based Training Contracts/Agreements such as: On-The-Job Training, Incumbent Worker Training, Registered Apprenticeship will be written based on availability of funding in the region. Any dispute that involves a WIOA-funded activity must be addressed by following GST's local grievance and complaint procedures.

ACTION:

GST Michigan Works! Service Providers shall take the appropriate actions necessary to ensure all participants and their files meet all the directives of this policy issuance. Service Provider officials shall ensure the information contained in this policy is disseminated to all appropriate staff.

INQUIRES:

Questions regarding this policy issuance should be directed to John Anderson Ext 159 or JulAnn Kuenzli 989-635-3561 Ext 230.

SIGNED:



Jody Kerbyson, CEO



Date