



## Area 11: Local Policy

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### On-the-Job Training [OJT] Policy

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#### **Purpose:**

This policy will provide guidance when the Workforce Development Board of Central Ohio (WDBCO) will fund an On the Job Training (OJT) for an eligible employer.

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#### **Background:**

OJT activities provided under the Workforce Innovation and Opportunity Act (WIOA), adult, dislocated worker, and youth participants can obtain the skill sets necessary to fill new and existing jobs. OJT is a type of training that is provided by an employer to a participant. During the training, the participant is engaged in productive work in a job for which he or she is paid, and the training provides knowledge or skills necessary to adequately perform the job. Employers must commit to hire and retain the participant at the end of a successful training period.

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#### **Policy:**

The Workforce Development Board of Central Ohio shall authorize the use of WIOA funding to support On-the-Job Training for eligible adults, dislocated worker and youth pursuant to Workforce Innovation and Opportunity Act, §§ 134, 188, Public Law 113-128 and in accordance with the State of Ohio's Workforce Innovation and Opportunity Act Policy Letter No. 15-22-1. The amount of OJT funding to be obligated towards adult, dislocated worker and youth programs shall be determined as part of the WDBCO Annual budget process. Organizations, Subrecipient and/or vendors awarded a contract to operate OJT programs will be required to meet the administrative and fiscal guidelines established by WIOA 20 CFR: 680-683, Ohio WIOAPL 15-22.1 and the WDBCO Procedure Manual.

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#### **OJT Requirements:**

- I. **Training** – In partnership with the WDBCO Business Solutions department, the Service Providers must ensure that employers offer training to participants who are engaged in productive work in a job that provides knowledge or skills essential to the full and adequate performance of the occupation. The Service Provider must reimburse the employer for the costs of providing the training and additional supervision related to the training. The training must be limited in duration as appropriate to the occupation for which the participant is being trained

Types of training:

- a. Adult – The focus of adult training will be towards occupational skills training, training focusing on the State of Ohio In-Demand Occupations, and training that may include a credential or certificate at the completion of the training period.

The WDBCO Business Solutions will consider employers that are focusing OJT opportunities at or above the Franklin County Sustainable Wage threshold, with attainable benefits, and an outlined career path.

- b. D.W. – The WDBCO Business Solutions team will consider employers that are providing industry upskilling, or new industry training opportunities that encourage a lateral or advancement towards reemployment.
- c. Youth - The focus of youth training will be towards occupational skills training, training focusing on the State of Ohio In-Demand Occupations, and training that include a credential or certificate at the completion of the training period.

The WDBCO - Business Solutions will consider employers that are focusing OJT opportunities at or above the Franklin County Sustainable Wage threshold, with attainable benefits, and an outlined career path.

- d. Employed Workers - The WDBCO Business Solutions team will consider employers that identify a certification and/or credential that will promote the State of Ohio In-Demand Occupations, which will support the participant’s career progression.
- e. Registered Apprenticeships - The WDBCO Business Solutions team will engage with employers that have registered apprenticeships and will consider local, community focused apprenticeships. Every RA program must have at least one incremental wage increase commensurate with an increase in skills and a recognized post-secondary credential under WIOA.
- f. Combined with (ITA) – Business Solutions is available to assist ITA recipients towards employment and OJT opportunities to secure a career path. Providing that the participant is not able to secure employment through the ITA training provider.

II. **Length of Training** - The duration of the OJT is limited in extent as appropriate to the occupation for which the participant is being trained, considering the content of the training, prior work experience of the participant, and the service strategy of the participant, as appropriate as defined in WIOA Section 3 (44). The duration of the OJT should include a minimum of 4 weeks (160 hours) and not exceed a maximum of 26 weeks (1,040 hours) unless extenuating circumstances exist, in which case appropriate documentation is required.

III. **Training Reimbursement** - WDBCO will reimburse up to 50% of the training wage, with exceptions to accommodate individuals with barriers to employment. Employers' training and hiring individuals with recognized barriers may qualify for reimbursement up to 75%, which will be determined on a case by case basis, as determined by the WDBCO.

OJT training payments to employers are deemed to be compensation for the costs associated with training a participant. Employers are to be reimbursed up to 50% of the wage rate of an OJT participant. The maximum expenditure of an individual OJT contract may be up to 6 months (1,040 hours) or \$14,000.

Reimbursement may only be made for the number of hours in training. OJT training must occur during the hours of actual work, employers will not be reimbursed for hours not worked such as holidays, vacation, sick days and time spent on jury duty or any other hours not designated as hours worked.

Overtime pay is not reimbursable under the OJT contract.

The employer is responsible for maintaining records and providing verification of hours to be reimbursed.

IV. **OJT Outreach Strategy** – Business Solutions engages with employers in many ways, not limited to:

- a. Employers inquiring through the OMJ Job Center;
- b. Referrals from Career Services;
- c. Area Chambers of Commerce, Economic Development partners, and other workforce/community partners;
- d. Strategic outreach must support the Business Solutions employer engagement goals (In-Demand industry Sectors) and tiering guidelines;
- e. Marketing materials, social media outreach, and WDBCO initiatives.

V. **Employer Prescreening** – Through the employer prescreening process of reviewing OJT eligibility and tiering evaluation, a determination will be established that the employer will meet minimum standards (WIOPL 15-22.1 Section III (b)) and can provide both training and employment to an OJT participant by the Business Solutions team.

VI. **Participant Eligibility for an OJT**- Participants must be actively enrolled with Career Services and/or CCMEP programming and if, after an interview, evaluation or assessment, and career planning, the participant has been determined to have the minimum skills and qualifications of the outlined job duties to successfully participate in an OJT.

VII. **Prohibited OJT Activities** - The following types of activities are prohibited from OJTs:

- a. Sectarian activities: Funds provided to employers for OJT may not be used to employ the participant/trainee in a position involving political or sectarian activities. Furthermore, OJT participants may not assist, promote or deter union organizing, or engage in political activities during work hours.
- b. Religious activities: OJT participants are prohibited from being employed in the construction, operation, or maintenance of any facility which is used for religious instruction or worship.

VIII. **OJT Agreements-** Each employer shall complete an OJT contract and other applicable documents with the appropriate signatures from authorized signers with the employer. Each employer executed OJT Contract Agreement must be signed and dated by the start date of the OJT.

OJT agreements are developed to overcome skill gaps for occupations currently in-demand as articulated by the Ohio Department of Job and Family Services Office of Workforce Development, and the WDBCO regional plan.

OJT agreements can only be executed and approved for full-time, not-temporary positions.

- IX. **Registered Apprenticeship** -Individual Training Accounts (ITAs) and OJT funds may be combined to support placing participants into a registered apprenticeship program, just as they can be used together for a participant who is not in a registered apprenticeship. Maintaining the requirement of a full-time, wage sustaining, benefit owning, career pathing employment.
- a. An ITA may be used to support the classroom portions of the apprenticeship program, and OJT funds may be used to support the on-the-job training portions of the program.
  - b. Depending on the length of the registered apprenticeship, OJT funds may cover some or all the registered Apprenticeship training.

#### **Definitions:**

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**Participant:** An individual who has been determined eligible to participate and who is receiving services

**Individual Employment Plan (Adult & Dislocated Worker) / (Youth):** An individual plan for a participant, which includes an employment goal, appropriate achievement objectives, and the appropriate combination of services for the participant based on an objective assessment.

**On-the-Job Training:** Training provided by an employer to a paid participant while engaged in productive work in a job that a) provides knowledge or skills essential to the full and adequate performance of the job; b) provides reimbursement to the employer of up to 50% of the training wage; c) is limited in duration as appropriate to the occupation for which the participant is being

trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

**Monitoring:**

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The WDBCO requires periodic check-ins with the participants and the employer. The Service Provider will conduct monthly check-ins with participants throughout the duration of the training. Along with the WDBCO Business Solutions leadership, the service provider will conduct at least one fully documented monitoring visit during the OJT duration.

The Service Provider will conduct monthly check-ins with the employer to verify the eligibility requirements and training program are being maintained.

OJT completion rates, employment retention rates and employment earnings will be specified in the contract and will be monitored for accuracy. An employer's failure to comply with the agreement will result in the employer being ineligible for further OJTs for a period of at least one year starting from the conclusion of the employer's last OJT.

**Reporting:**

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All participants must be eligible, enrolled in WIOA, and entered in Ohio's Workforce Case Management System (OWCMS). Participants may also be co-enrolled in other state-funded WIOA programs.

**References:**

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WIOA Section 3(44) 20 CFR 680.700

WIOA Section 134(c)(3)(h)

20 CFR 680.700

20 CFR 680.720

20 CFR 680.530

20 CFR 680.730

2 CFR Part 200, Appendix II

WDBCO On-the-Job Training Procedure Manual

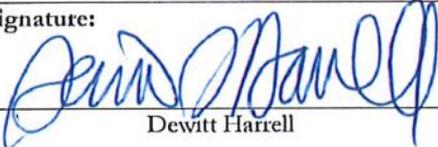
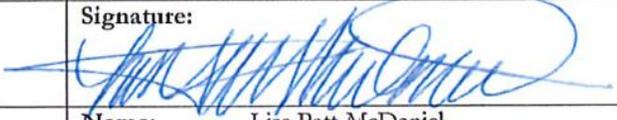
**Inquiries:**

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Stephanie Robinson, Policy Director  
Workforce Development Board of Central Ohio  
1650 Lake Shore Drive, Suite 110  
Columbus, Ohio 43204  
614-559-5064

**Approved:**

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| WDBCO Board  | WDBCO   |
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| <b>Signature:</b><br> | <b>Signature:</b><br> |
| Dewitt Harrell   | <b>Name:</b> Lisa Patt-McDaniel   |
| <b>Title:</b> WDBCO Board Chair  | <b>Title:</b> President & CEO   |
| <b>Date:</b> 3/11/19   | <b>Date:</b> 3/11/19  |