



*Boone and Winnebago Counties Workforce Investment Board*

**POLICIES  
REGARDING  
WIA TITLE I-B SERVICES/ACTIVITIES**

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Updated 5/7/10

Posted on WIB Website 5/7/10

The *Programmatic* Committee’s name was changed to *Program Oversight* Committee in July 2003. In these *WIB Policies* references to the *Programmatic* Committee have been changed to *Program Oversight* Committee except in instances when the Committee’s specific action on an item is given.

*Boone/Winnebago Workforce Investment Board*

**INTENSIVE SERVICES POLICIES**

Items 1-5 adopted by the LWIB 1/9/01

Item 6 adopted by the LWIB 3/6/01

Item 6 date of reconsideration by LWIB Programmatic Committee--  
modified by Programmatic Committee 2/14/02, 9/19/02

Items 6 removed by WIB and Item 5 modified by WIB 8/4/09

The *Intensive Services Policies* also included in the ITA Policies.

Participants who are determined to be in need of short-term pre-vocational services in order to obtain or retain employment that leads to self-sufficiency may be enrolled in individual credit or non-credit courses that do not lead to certification; these courses will be classified as *Intensive Services*.

1. Courses must be directed toward growth occupational employment;
2. Courses must be specifically approved by the LWIB (Program Oversight Committee) as *Intensive Services* or be included in an ITA program certified by the LWIB (Program Oversight Committee);
3. Individuals must be unable to obtain other funding sources to cover the cost to the *Intensive Services* courses;
4. Courses that are prerequisites for certified ITA programs but are not listed in the certified program's course requirements will be automatically classified as *Intensive Services*.
5. In all cases, a participant's Individual Employment Plan (IEP) must include a detailed career plan that shows how the Intensive Services course(s) the participant will take will enhance his/her ability to be employed/reemployed. The career plan must be based on an assessment of the participant's skills and abilities.

Boone/Winnebago Workforce Investment Board

**PROVIDER CERTIFICATION POLICIES  
and  
INDIVIDUAL TRAINING ACCOUNT (ITA) POLICIES**

- Adopted 10/3/00
- ITA Policy 8.a. Appeals Process--Adopted 1/9/01
- Policy Regarding Individual Courses Submitted for WIA Funding--Adopted 1/9/01*
- Amendment to Item 6. of *Policy Regarding Individual Courses Submitted for WIA Funding--*  
Adopted 3/6/01
- ITA Cap Policy--Adopted 7/3/01
- Modification to *Provider Certification Policies*, Item 2. – Adopted 5/7/02
- ITA Cap Policy Modified--10/7/03*
- Amendment to II.2, policy regarding the application of financial aid—Adopted 8/2/05
- Provider Certification Item 3, *Appeals Process for Programs Denied Certification/Recertification*—Adopted 12/6/05
- Amendment to II. 6. regarding development of training plan—Adopted 2/7/06
- Amendment to II.10. regarding cap for TAA participants—Adopted 2/7/06
- Addition of II.11.—Adopted 2/7/06
- Modification to Item 10—Cap increased to \$6,000—Adopted 11/6/07
- Addition to Item 10 regarding criteria for enrollment in ITAs, re-enrollment, and appeals—Adopted 11/6/07
- Modification to Item 10—Cap increased to \$10,000—Adopted 9/1/09
- Modification to Item II.2. –*Grant assistance* replaces words *financial aid*; *other education-related expenses* replaces word *fees*—Adopted 2/2/10

Preliminary Note:

Under the Workforce Investment Act, tuition-based training for participants will be conducted under Individual Training Accounts (ITAs) with training providers that are certified by local Workforce Investment Boards (WIBs). The provider certification process “is intended to ensure that a minimum standard of quality has been met by providers that want to offer programs to Title I WIA-eligible individuals” (from State of Illinois Training Provider Certification Policy for Initial Eligibility). All programs certified by local Workforce Investment Boards are placed on a statewide list of certified training programs. This statewide list of WIA certified training programs is available at [www.iwds.state.il.us](http://www.iwds.state.il.us).

Using an ITA, “WIA Title I adult and dislocated workers purchase training services from eligible providers they select in consultation with the case manager. Payment from ITAs may be made in a variety of ways, including electronic transfer of funds through financial institutions, vouchers, or other appropriate methods” (final Federal Regulations, § 663.410). From the statewide list of certified training programs and after consultation with a case manager, participants may select any program that addresses their training needs. They will be required to adhere to local WIB ITA policies.

To be eligible for an ITA, a participant must:

- Have not been able to become employed or retain employment through Intensive Services;
- Have the skills and qualifications to successfully participate in the selected training program (as determined by one-stop operator after participant interview, assessment or evaluation, and case management);
- Select a program directly linked to employment opportunities in the local area or another area to which the individual is willing to relocate;
- Be unable to obtain grant assistance (Pell or other forms of financial aid); or requires assistance beyond the assistance made available under grant assistance programs (including Pell) and other applicable forms of financial aid at the federal, state, or local

level.

The Boone/Winnebago Workforce Investment Board Provider Certification and ITA Policies follow. The Internal ITA Procedures follow the ITA Policies.

## **I. PROVIDER CERTIFICATION POLICIES**

1. In addition to adhering to the Illinois *WIA Training Provider Certification Policy*, programs approved in WIA 3 for funding must be in growth occupational areas or occupational areas with large numbers of employment opportunities in the northern Illinois (adopted 10/3/00).
2. The Boone/Winnebago Workforce Investment Board (LWIB) gives the Program Oversight Committee the authority to act in the LWIB's behalf to certify training programs that meet the criteria in 1. above. (The LWIB will be updated regularly regarding programs that have applied for certification in WIA 3 and been approved by the Committee.)
3. Provider's Request for Reconsideration of Program(s) Denied Certification as Individual Training Account (ITA) Program(s)—Appeals Process for Programs Denied Certification/Recertification (adopted 12/6/05)
  - a. The Boone/Winnebago Workforce Investment Board (WIB) has the right to deny a Provider certification for a training program(s) during both the initial and subsequent phases of the certification process.
  - b. A Provider whose program(s) was/were rejected will be notified of its program's(s') rejection, the reason for the rejection, and the appeals process (Provider's Request for Reconsideration of Program Denied Certification as an ITA Program) via e-mail or letter within five days of the rejection if the provider was not in attendance at the Program Oversight Committee meeting at which its program(s) was/were presented for approval. (The reasons for a program's rejection will be discussed during the meeting at which the program is rejected and the Provider, if present at the meeting, will be given a copy of the appeals process.)
  - c. A Provider that applied for certification of a training program(s) and has been denied certification has a right to file an appeal with the WIB's Executive Director. This appeal must be presented via letter or e-mail within 21 calendar days of the date the program was denied approval.
  - d. The appeal will then be reviewed by the Program Oversight Committee within 21 days of the WIB Executive Director's receipt of the appeal. The appealing Provider may address the Committee at the time the appeal is considered.
  - e. The Program Oversight Committee will either accept or reject the Provider's appeal.
  - f. The Provider will be notified via e-mail or letter of the Program Oversight Committee's decision regarding the appeal.
  - g. A Provider that has appealed to the Program Oversight Committee and has had its appeal denied, may file a second appeal with the WIB's Executive Director. This second appeal

must be presented via letter or e-mail within 21 calendar days of the date the program was denied for the second time.

- h. This second appeal will be reviewed by the WIB's Executive Committee within 21 days of the WIB Executive Director's receipt of the appeal. The appealing Provider may address the Committee at the time its second appeal is considered.
- i. The WIB's Executive Committee's decision regarding the appeal will be final.
- j. If the Program Provider's appeal is denied by the WIB's Executive Committee, the Provider may, in accordance with the State's WIA Training Provider Certification Policy (PY '01 WIA Policy Letter No 01-29, page 17), reapply to have its program(s) certified/recertified not less than one year from the date of the denial of program certification.

## **II. INDIVIDUAL TRAINING ACCOUNT (ITA) POLICIES**

1. ITAs will be used only for funding vocational (occupational skills) training programs.
2. All participants must apply for Pell and any other appropriate grant assistance, and provide proof of application for this aid. The Pell grant funding received by a participant must be applied toward the participant's tuition and other education-related expenses. If funding is required beyond available grant funds (i.e., PELL grants, WIA funds, etc.), participants are required to arrange other means of financial aid, such as loans; or they have the option of choosing a less expensive training program.
3. For approved programs, WIA will also pay the reasonable cost of participants' required books and special supplies, including uniforms and tools.
4. Supportive Services for participants in ITA training will be determined on an individual basis and based on participants' needs.
5. Supportive Services (e.g., transportation, child care, emergency housing) will not be available to participants choosing to attend ITA-approved programs beyond 100 miles from their homes. (This policy does not apply to TAA participants.)
6. A participant may receive ITA funding for up to two full years. The participant and his WIA counselor must jointly develop a plan for a participant to complete the training within two years. (Any ITA funding beyond two years must be approved by the Program Oversight Committee.) [Middle sentence adopted 2/7/06.]
7. Participants must complete three core services and at least one intensive service activity (such as a workshop, class, etc.), as well as meet the ITA eligibility criteria (page 1), before receiving an ITA.
8. To continue to receive ITA funding, participants must:
  - a. Maintain an overall C or equivalent average;
  - b. Bring/send their grade or progress records to their WIA Case Manager prior to the start of a new semester/quarter to prove they maintained a C or equivalent average; and

- c. Report their progress in training to their WIA Case Manager at least once each month.
- 9. WIA Title I-B funds may not be used for participants to retake classes.
- 10. A per participant ITA cap of \$10,000 for up to two-years' tuition and fee costs is established. *[9/1/09: The WIB increased the cap from \$6,000 to \$10,000.]*

Exceptions to the above ITA cap may be authorized by the Program Oversight Committee of the WIB if a participant requests to enroll in a more costly ITA program. The request must be made and authorized prior to the participant entering the program.

Addition to Item 10 adopted by the WIB 2/7/06:

If an individual is TAA eligible and must begin or continue training under WIA funding because TAA funds have been exhausted or are not available, the amount of ITA training assistance that the participant receives under WIA 1D or 1S/1E may exceed the \$10,000 cap. *[9/1/09: Cap increased to \$10,000.]* ITA training for WIA/TAA participants will be paid from WIA funds only in instances when TAA funds are exhausted or unavailable. (This addition to the ITA Policy is retroactive to July 1, 2005.)

Addition to Item 10 adopted by WIB 11/6/07:

Initial Enrollment in ITA Training

An in-depth assessment of an individual participant's training needs must be made to determine what is best for the participant and best for the overall program. The filters that will be applied during the individual's assessment and program selection process include the following:

- 1. The individual is in need of training;
- 2. The individual has the skills and qualifications to complete successfully the selected training program;
- 3. The individual is unable to obtain grant assistance from other sources to pay the costs of selected training;
- 4. The selected training program is directly linked to employment opportunities in the area (or another area to which the individual is willing to relocate);
- 5. Training will lead to the individual's self-sufficiency.

Re-enrollment in ITA Training

For current and re-enrolled WIA participants, any ITA training beyond their previous ITA training will be presented for a WIA administrator's authorization only after a staff committee has reviewed the individual participant's circumstances leading to the additional training request and made a recommendation to approve the additional training for the participant.

Participants' Appeal Process

Participants may appeal the training decisions of counseling staff directly to the administrator of the Adult Program or Dislocated Worker Program.

Participants may appeal the decisions of the Adult Program or Dislocated Worker Program's

administrator to the WIB's Program Oversight Committee. The Committee will then uphold the administrator's decision or render a new decision. The decision of the Committee is final.

11. The following policy applies to youth who are in a subcontracted youth program, have earned a high-school diploma or GED, and are subsequently enrolled in an approved ITA program: The Program Provider is responsible for counseling of their program youth in an ITA program and for providing a year of follow-up with these youth after they exit WIA (adopted 2/7/06).

**Appeals Process for Policy 8.a., "Maintain an overall C or equivalent average"**

A participant may request a review of special circumstances(s) affecting the first semester/quarter grades by:

- Submitting a written request for review of the special circumstances affecting grades and class standing to the program's supervisor. The written request will summarize the "special circumstances" why the appeal is sought.
- Submitting the request within one week of receipt of grades and prior to the start of the next semester.
- Submitting proof of attendance in all classes.

The supervisor and participant's counselor/case manager will review the appeal and schedule a meeting with the participant.

If, after the meeting with the participant, the supervisor determines the appeal is valid, he/she may waive the policy for the participant. The waiver must be signed by the Supervisor and the participant.

(See next page for *Policy Regarding Individual Courses Submitted for WIA Funding.*)

**POLICY REGARDING INDIVIDUAL COURSES SUBMITTED FOR WIA FUNDING**

[These are the *Intensive Services Policies* effective 8/4/09.]

Participants who are determined to be in need of short-term pre-vocational services in order to obtain or retain employment that leads to self-sufficiency may be enrolled in individual credit or non-credit courses that do not lead to certification; these courses will be classified as *Intensive Services*. [Note: An R&R must have been distributed specifically listing the course as an Intensive Services course before a voucher is completed.]

1. Courses must be directed toward growth occupational employment;
3. Courses must be specifically approved by the LWIB (Program Oversight Committee) as *Intensive Services* or be included in an ITA program certified by the LWIB (Program Oversight Committee);
3. Individuals must be unable to obtain other funding sources to cover the cost to the *Intensive Services* courses;
5. Courses that are prerequisites for certified ITA programs but are not listed in the certified program's course requirements will be automatically classified as *Intensive Services*.
5. In all cases, a participant's Individual Employment Plan (IEP) must include a detailed career plan that shows how the Intensive Services course(s) the participant will take will enhance his/her ability to be employed/reemployed. The career plan must be based on an assessment of the participant's skills and abilities.

**INTERNAL PROCEDURES**  
**RELATED TO INDIVIDUAL TRAINING ACCOUNTS**

Participants may receive ITAs only for programs that are on the state-approved list.

1. RRTC must have a *Master ITA-Vendor Agreement* completed with the program provider before a participant may begin attending an approved program.
2. A *Referral & Recruitment* form listing the programs that RRTC will fund with the Vendor must be issued (posted on the WIB's website) before vouchers may be issued for a participants' enrollment in a program.
3. A RRTC Voucher will be used for tuition, fees, and books.

*Boone/Winnebago Workforce Investment Board (LWIB)*

**ON-THE-JOB TRAINING (OJT) PROGRAM POLICIES**

Adopted 11/7/00

Modified 12/3/00 and 1/9/01

Certificate finalized 4/01

Modified 8/3/04

Modified 5/4/10—*former Item 2 removed; Wages item modified; OJT Policies renumbered*

**Introduction**

The Boone/Winnebago WIB On-the-Job Training (OJT) Program helps area employers obtain reliable employees whom they hire under a Workforce Investment Act (WIA) OJT contract and then train for their specific needs.

The Workforce Investment Act defines *on-the-job training* (OJT) as:

...training by an employer that is provided 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 percent of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; and
- 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.

WIA section 101(31)

**On-the-Job Training (OJT) Program Policies**

1. The employer can have no regular employee, currently on lay off from the same or similar position, as the position for which OJT funding is being sought.
2. The LWIB reserves the right to deny future OJT contracts to employers who have not honored previous OJT contract obligations.
3. Emphasis will be placed on OJT positions that provide identifiable and transferable skills that can be used by the trainee on a long-term basis.
4. All OJT contracts must be approved by Rock River Training Corporation's Executive Director, who will submit an updated listing of OJT contracts written to the LWIB's Program Oversight Committee at each of their meetings.
5. **Participant Eligibility:** Individuals who are interested and in need of OJT will complete a comprehensive assessment process which includes math and reading assessment and evaluation of their work history and job skills. An individual will be eligible for an OJT when the training eligibility requirements of the WIA are met.

6. Occupational Eligibility: WIA staff will seek and receive job orders for permanent occupations from companies and businesses in both the public and private sector. OJT will be an allowable activity for quality occupations that, coupled with the participant's capabilities, contribute to their:
  - a. economic self-sufficiency
  - b. skill development
  - c. occupational upward mobility
  - d. permanent employment beyond the end of the OJT contract.

Occupations for which training will **not** be approved include, but are not limited too, the following:

- a. intermittent or seasonal occupations
  - b. occupations that have not traditionally required any specific occupational training
  - c. occupations which require less than four weeks of training.
7. Contract Period: Contract periods will be based on the time required to acquire a particular skill. Each job order or occupation falls within a SOC Code which is assigned a Specific Vocational Preparation (SVP) level. The SVP levels represent the amount of training time required to be proficient in an occupation. (See the attachment for further information.) WIA staff will only write OJT contracts for occupations which have a SVP level of 2 to 7.

Individuals selected for an OJT contract will not be placed in an occupation in which they have had prior experience, unless some of the skills required are in a new area for which technology and skills have changed significantly enough to warrant additional training. In these cases, the OJT contract will result in a shorter training period because of the individual possessing some prior experience. This will be strictly an exception to the regular OJT placement procedure.

Reasonable tools, equipment, and clothing not provided by the employer on all OJT contracts may be provided by WIA funds, based on the participant's need. If the trainee does not complete the OJT, the local WIA program will retain ownership of tools and/or equipment. A reasonable cost for required tools is a cost that does not exceed \$300 per trainee.

8. Working Conditions: All OJT participants shall be subject to the same working conditions (i.e., benefits, bonuses, etc.) as other employees hired by the employer
9. Employees' Wages: The minimum starting wage rate for all OJT employees shall be the employer's normal entry wage rate for the occupation for which they are being employed.
10. Collective Bargaining Agreements: As applicable, the employer will obtain the concurrence of the collective bargaining representative regarding the on-the-job training position and the rate of pay for the position.
11. Reimbursement for Training: After the appropriate training time and hourly wage have been established, the reimbursement for the agreement will be computed by multiplying 50% of the hourly wage times the number of training hours.

On a monthly basis the employer must submit the following to Rock River Training Corporation: (a) invoice form, (b) payroll records showing the gross wages paid to the trainee, and (c) time records showing actual hours worked. RRTC will reimburse employers for the regular hours a

trainee actually worked up to 40 hours per week.

12. Evaluation: After a participant has been active in an OJT contract position for approximately one month, an evaluation will be completed by the employer to evaluate the participant's performance and progress for that period of time. The OJT Employer Evaluation form will be kept in the contract monitoring file.
13. Monitoring: Monitoring of an OJT contract will be done on site by WIA staff at least once for a 1-3 month contract or twice for a 4-6 month contract to determine the progress of the participant during that training period. The WIA staff will complete an OJT Monitoring Summary which will be kept in the contract monitoring file.
14. Corrective Action: If there are findings or problem areas identified during OJT monitoring, corrective action will be recommended to the employer. A date will be agreed upon by the employer and WIA staff to correct the findings and/or problems. The WIA staff will follow-up to determine if the corrective action was completed. If the corrective action is not completed, steps may be taken to terminate the agreement.
15. Credentialing of Participants Who Complete their Individual On-the-Job-Training Program: An Adult and Dislocated Worker who at the completion of his/her OJT satisfactorily performs all tasks identified on his/her Individual Training Plan (as determined by the employer) shall receive a credential (certificate) that indicates he/she has the skills necessary to perform the specific job for which he/she has been trained. The trainee's employer and LWIB Program Oversight Committee chair will sign the certificate.

[The certificate finalized in April 2001 indicates that the participant completed his/her training plan for his/her specific position. The employer and chair of the WIB will sign the certificate.]

The Boone/Winnebago OJT program must also adhere to any applicable rules contained in the WIA legislation or applicable federal or state regulations.

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*[The length of OJT agreements are determined on an individual basis by the OJT position's Specific Vocation Preparation—SVP—code, the position's job description, and the job experience of the OJT employee.]*

OJT Policies Attachment

Information on Specific Vocational Preparation Levels

Section updated and revised 11/28/07

Occupational projections for the state and sub-state areas are developed by the Illinois Department of Employment Security (IDES). These growth rate projections are listed for occupations classified by O\*Net-SOC (Standard Occupational Classification) codes.

Each O\*Net SOC code has been matched to a Specific Vocational Preparation (SVP) level. SVP levels represent the amount of time required for one to obtain the knowledge and skills needed for average performance on the job.

Scale of Specific Vocational Preparation (SVP):

<u>Level</u>	<u>Time</u>
1	Short demonstration only
2	Beyond short demonstration up to 30 days
3	Over 30 days up to 3 months
4	Over 3 months up to 6 months
5	Over 6 months up to 1 year
6	Over 1 year up to 2 years
7	Over 2 years up to 4 years
8	Over 4 years up to 10 years
9	Over 10 years

To determine an occupation's SVP, WIA staff use information available on the website *O\*Net Online*. [www.online.onetcenter.org](http://www.online.onetcenter.org). (To find SVP level, WIA staff enter occupation's O\*Net-SOC code, then click on occupation's name, then click on *Job Zone*. More information on the SVP is available on the *O\*Net Online* website under the *Help* feature.)

*Boone/Winnebago Workforce Investment Board*

**WORK EXPERIENCE POLICIES**

Adopted 12/5/00

Modified 10/2/01

Modified 5/5/09

1. Work experiences may be in the private-for-profit sector, the non-profit sector or in the public sector, for participants whose objective assessment and individual service strategy indicate that work experiences are appropriate. Work experiences may be paid or unpaid.
2. Work experiences will be in positions that are “entry-level.”
3. For paid work experiences, WIA will pay the participants’ wages and related benefits. Wages will be paid at the same entry-level rate paid trainees or employees in the same or similar positions at the worksite. However, no position will be paid less than the federally established minimum wage.
4. Generally participants in work experience will work 30 hours or less a week; and the duration of their work experience will not exceed 360 hours. Exceptions include:
  - Special circumstances when it has been determined that an individual participant needs additional work experience to enable him/her to gain unsubsidized employment. (All such exceptions must be approved by the WIB Program Oversight Committee.); and
  - American Recovery & Reinvestment Act Summer Employment Program.
5. No participant will work in any subsidized work experience position when the same or substantially equivalent position is vacant due to a hiring freeze.
6. The WIB reserves the right to deny future work experience requests from worksites that have not honored the requirements set forth in previous work experience agreements.
7. All work experience agreements must be approved by the RRTC Director who will submit an updated list of Work Experience Agreements to the WIB’s Program Oversight Committee at each of their meetings.
8. All participants in work experience will be required to participate in job readiness/job search skills activities. Participants in subcontracted programs will be required to follow the class/workshop attendance procedures required by their program provider

*Boone/Winnebago Workforce Investment Board*  
**WIA On-Going Supportive Services Policies**

Policies Adopted by WIB on March 6, 2001

Child Care and Transportation Sections Modified 9/6/05

Transportation Section Modified 3/4/08—Transportation Amounts Increased

*Applicable Federal Register citations:*

**20 CFR 663.800 - What are supportive services for adults and dislocated workers?**

Supportive services for adults and dislocated workers are defined at WIA sections 101(46) and 134(e)(2) and (3). They include services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under WIA title I. Local Boards, in consultation with the One-Stop partners and other community service providers, must develop a policy on supportive services that ensures resource and service coordination in the local area, such policy should address procedures for referral to such services, including how such services will be funded when they are not otherwise available from other sources. The provision of accurate information about the availability of supportive services in the local area, as well as referral to such activities, is one of the core services that must be available to adults and dislocated workers through the One-Stop delivery system. (WIA section 134(d)(2)(H).)

**20 CFR 663.805 - When may supportive services be provided to participants?**

- (a) Supportive services may only be provided to individuals who are: (1) Participating in core, intensive or training services; and
- (2) Unable to obtain supportive services through other programs providing such services. (WIA section 134(e)(2)(A) and (B).)
- (b) Supportive services may only be provided when they are necessary to enable individuals to participate in title I activities. (WIA section 101(46).)

**20 CFR 663.810 - Are there limits on the amounts or duration of funds for supportive services?**

- (a) Local Boards may establish limits on the provision of supportive services or provide the One-Stop operator with the authority to establish such limits, including a maximum amount of funding and maximum length of time for supportive services to be available to participants.
- (b) Procedures may also be established to allow One-Stop operators to grant exceptions to the limits established under paragraph (a) of this section.

**Participant Eligibility**

Only persons who are enrolled in WIA funded Classroom or Vocational *Intensive Services* or *Training* activities in *IWDS* may be eligible to receive on-going supportive services.

**Training**

Participants attending training will only be eligible for assistance under this policy if the program/classes they are attending have been approved by the Workforce Investment Board, whether or not that training is actually being funded by WIA. The program/classes may be classified as either *Intensive* or *Training* services. This requirement will help staff in providing services that comply with previously approved Board policies and plans.

**On-Going Supportive Services**

The availability of On-going Child Care and Transportation assistance is based upon the availability of funds and the participant's demonstrated need. **All rates (Child Care rates for Licensed Day Care Center,**

**License-Exempt Day Care Center, Licensed Day Care Home or Licensed Group Day Care Home, and License-Exempt Day Care Home or Care in Child's Home** are based on the State rate. If the State rate for these categories changes, the WIB-approved rates will be adjusted to remain consistent with the State rate.

**CHILD-CARE** (not-to-exceed payments)\*

	<i>Under Age 2</i>		<i>Age 2</i>		<i>Age 3 and Older</i>		
	<b>Full-Day</b> per child	<b>Part-Day</b> per Child <i>(less than 5 hours)</i>	<b>Full-Day</b> per Child	<b>Part-Day</b> per child <i>(less than 5 hours)</i>	<b>Full-Day</b> per Child	<b>Part-Day</b> per Child <i>(less than 5 hours)</i>	<b>School-Age Day</b>
Licensed Day Care Center	<b>\$41.51</b>	<b>\$20.76</b>	<b>\$32.80</b>	<b>\$16.40</b>	<b>\$24.60</b>	<b>\$12.30</b>	<b>\$12.30</b>
License-Exempt Day Care Center	<b>\$40.50</b>	<b>\$20.25</b>	<b>\$32.00</b>	<b>\$16.00</b>	<b>\$24.00</b>	<b>\$12.00</b>	<b>\$12.00</b>
Licensed Day Care Home or Licensed Group Day Care Home	<b>\$24.19</b>	<b>\$12.10</b>	<b>\$23.17</b>	<b>\$11.59</b>	<b>\$22.14</b>	<b>\$11.07</b>	<i>same as Part- Day</i>
License-Exempt Day Care Home or Care in Child's Home	<b>\$13.07</b>	<b>\$6.54</b>	<b>\$13.07</b>	<b>\$6.54</b>	<b>\$13.07</b>	<b>\$6.54</b>	<i>same as Part- Day</i>

\* Child Care figures were effective 1/1/10.

**TRANSPORTATION**

<b>Traveling Distance from Home to Site</b>	<b>Amount Per Day**</b>
1-10 Miles	<b>\$10.00/Day</b>
11-30 Miles	<b>\$14.00/Day</b>
31-99 Miles	<b>\$24.00/Day</b>
100 >	<b>\$0</b>

\*\* approved by WIB 3/4/08; implemented 3/9/08

If a WIA participant is co-enrolled in the TAA program, the amount of transportation assistance that the participant receives will be based on the federal TAA transportation assistance regulations. Transportation assistance for WIA/TAA participants will be paid from WIA funds only in instances when TAA funds are exhausted.

The above addition to the transportation policy is retroactive to January 1, 2005.

[The TAA transportation assistance policy follows the Federal TAA regulations regarding training transportation payments. These regulations were emphasized at the DCEO 2005 Spring TAA Roundtable: “If you are providing a participant with TAA approved training—you must reimburse transportation at the federal rate.”]

**Approval**

All requests for On-Going Supportive Services will be approved by the Case Manager’s supervisor.

**Documentation**

Proper justification for a participant’s receipt of on-going supportive services must be documented in the DCEO case notes of the participant and correspond with the participant’s *Individual Employment Plan*. As required by law, the case notes should also support the Case Manager’s attempts to find funding for the participant’s needs through other sources.

Day Care Providers and participants must sign a *Day Care Attendance Sheet* for each child whose day care costs are entirely or partially paid by WIA supportive services monies.

Boone/Winnebago Workforce Investment Board  
**WIA Supplemental Supportive Services Policies**  
*Policies Adopted by WIB on February 6, 2001*

Applicable Federal Register citations:

**20 CFR 663.800 - What are supportive services for adults and dislocated workers?**

Supportive services for adults and dislocated workers are defined at WIA sections 101(46) and 134(e)(2) and (3). They include services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under WIA title I. Local Boards, in consultation with the One-Stop partners and other community service providers, must develop a policy on supportive services that ensures resource and service coordination in the local area, such policy should address procedures for referral to such services, including how such services will be funded when they are not otherwise available from other sources. The provision of accurate information about the availability of supportive services in the local area, as well as referral to such activities, is one of the core services that must be available to adults and dislocated workers through the One-Stop delivery system. (WIA section 134(d)(2)(H).)

**20 CFR 663.805 - When may supportive services be provided to participants?**

- (a) Supportive services may only be provided to individuals who are:
  - (1) Participating in core, intensive or training services; and
  - (2) Unable to obtain supportive services through other programs providing such services. (WIA section 134(e)(2)(A) and (B).)
- (b) Supportive services may only be provided when they are necessary to enable individuals to participate in title I activities. (WIA section 101(46).)

**20 CFR 663.810 - Are there limits on the amounts or duration of funds for supportive services?**

- (a) Local Boards may establish limits on the provision of supportive services or provide the One-Stop operator with the authority to establish such limits, including a maximum amount of funding and maximum length of time for supportive services to be available to participants.
- (b) Procedures may also be established to allow One-Stop operators to grant exceptions to the limits established under paragraph (a) of this section

**Participant Eligibility**

Only participants actually enrolled in a WIA funded activity in IWDS will be eligible for assistance under this policy. Although this policy does apply to those participants enrolled in Core activities or Follow-Up, all requests for support must be substantiated as stated below under documentation and they must further the employment goal of WIA for that participant.

**Training**

Participants attending training will only be eligible for assistance under this policy if the program/classes they are attending have been approved by the Workforce Investment Board, whether or not that training is actually being funded by WIA. The program/classes may be either Intensive or Training services. This requirement will help staff in providing services that comply with previously approved Board policies and plans.

(An example of an inappropriate supportive service request would be providing supportive service assistance

to a participant in training in a non-growth occupation, which would result in spending WIA funds for an employment goal which is counter-productive to attaining WIA goals, including performance goals.)

**Normal Support Items**

This policy applies to items not required by a training agency. All required items will be stated on the Recruitment & Referral Form. Below is a list of items which can be purchased:

<u>Item</u>	<u>Maximum Paid by WIA</u>
Automobile related needs . . . . . (This item includes car repairs, licenses, car insurance. See below for more specific policies regarding this item)	\$500
Clothing . . . . .	150
Eye exam & glasses . . . . .	130
Job Related Tools . . . . .	300
Protective Shoes . . . . .	100
Utilities . . . . .	100

**Car Repairs**

During a participant’s enrollment in WIA , automobile related needs described above will paid up to a total (cap) of \$500. Car repairs will be provided for a participant only with proof of insurance, copy of registration and a valid driver’s license. The repairs to the vehicle must make it able to provide reliable transportation.

**Job Search Allowance**

Participants enrolled in Self-Directed Job Search and/or Job Development may request a \$20/month job search allowance. This allowance will support job search activities such as dry cleaning interview clothes, getting a haircut, etc.

**Approval**

All requests for the items listed above will be approved by the Case Manager’s supervisor. Any item other than those listed above must have prior approval from the Rock River Training Corporation’s Director in addition to that of the supervisor before authorization can be given to purchase the item.

**Documentation**

Proper justification for any purchase under this policy must be documented in the case notes of the participant on IWDS, thus supporting that participant’s Individual Employment Plan. Also included in the case notes will be statements which support the Case Manager’s attempts to find funding for the participant’s need through other sources, as required under the law.

Boone/Winnebago Workforce Investment Board

**SELF-SUFFICIENCY DEFINITIONS FOR ADULTS AND DISLOCATED WORKERS**

Adopted 7/11/00

Modified 10/2/01

(LLIL adjustments made when necessary.)

**Modified Self-Sufficiency Definitions:**

**Self-sufficiency for Adults:**

Employment that pays at least **125 %**\* of the lower living standard income level, which is defined in the Section 101 (24) of WIA as: “...the income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary [of Labor] for the most recent lower living standard **family budget** issued by the Secretary.”

\* 125% of LLIL as of May 2009 for Winnebago/Boone Family of:  
One-- \$14,940; Two--\$24,490 Three--\$33,613.75; Four--  
\$41,497.50; Five--\$48,967.50; Six-- \$57,277.50; for family members with more than six members, add \$8,310 for each additional member.

**Self-Sufficiency for Dislocated Workers:**

Employment that pays 1) at least 90% of the pre-dislocation wage of the individual or 2) 125% of the lower living standard wage (defined above), whichever is higher.

\* 125% of LLS figures are from the state WIA Notice No. 08-NOT-35 issued May 12, 2009

Boone/Winnebago Workforce Investment Board

**POLICY REGARDING ADULT SERVICE PRIORITY SYSTEM**

Adopted 7/11/2000

WIA requires that at least 51% of adult participants enrolled in intensive and training\* services must be TANF or low-income participants or 51% of adult monies must be spent for intensive and training services for TANF or low-income participants.

As the initial local **Adult Service Priority System for WIA**, the WIB adopted the JTPA adult service priority system:

All participants must be from low-income\*\* families except that 10% of the adult participants' family income levels may be above the "low-income" levels providing they have one or more barriers to employment." These *barriers to employment* for adults include:

- older individual
- veteran
- limited English proficiency
- drug/alcohol dependency
- disability affecting employment
- offender
- displaced homemaker
- migrant worker

\* Intensive Services include activities such as comprehensive and specialized assessment, full development of individual employment plans, group counseling and career planning, case management, short tem pre-vocational, follow-up services.

Training Services include: occupational skills training, on-the-job training, workplace and cooperative education programs, private sector training programs, skill upgrading and retraining, entrepreneurial training, job readiness training, adult education and literacy activities in combination with training, customized training.

\*\* Use the current Winnebago/Boone low income levels by family size.

Boone/Winnebago Workforce Investment Board

**DEFINITIONS RELATING TO  
WIA YOUTH ELIGIBILITY REQUIREMENTS**

Adopted 5/2/01

The youth eligibility requirements listed below incorporate the local definitions of:

- (1) *an individual who requires additional assistance to complete an educational program or to secure and hold employment* -- approved by the WIB July 11, 2000; and
- (2) *other youth who face serious barriers to employment as identified by the local board* -- approved by the WIB on May 1, 2001.

1. **Eligibility Criteria for Not Less than 95% of the Youth:**

In order to be provided services under the youth funding stream, an individual must meet the general eligibility requirements, and be:

- 1. Age 14 through 21;
- 2. A low income individual; and
- 3. A person who has one or more of the following barriers to employment:
  - a. Deficient in basic literacy skills\*;
  - b. A school dropout,
  - c. Homeless,
  - d. Runaway,
  - e. A foster child,
  - f. Pregnant,
  - g. A parent,
  - h. An offender, **or**
  - i. An individual who requires additional assistance to complete an educational program, or to secure and hold employment—The individual:
    - (1) Is one or more grade levels below the grade level appropriate to the individual's age,
    - (2) Possess one or more disabilities, or
    - (3) *Faces serious barriers to employment as identified by local boards*, i.e.
      - (a) Is a victim of domestic violence, or
      - (b) Has a substantial substance abuse problem, or
      - (c) Is a victim of sexual assault.

\* An individual deficient in basic skills computes or solves problem, reads, writes, or speaks English at or below grade 8.9; **or** is unable to compute or solve problems, read, write or speak English at a level necessary to function on the job, in the individual's family or society. Anyone who meets the definition of deficient in basic skills is considered to be basic skills deficient.

**II. Eligibility Criteria for No More than 5% of the Youth:**

In addition to the above persons, up to five percent of the youth participants served in a local area may be individuals who do not meet the income criterion for eligible youth, provided that they are within one or more of the following categories:

- A. A school dropout,
- B. Basic skills deficient (same as *deficient in basic skills*),
- C. One or more grade levels below the grade level appropriate to the individual's age,
- D. Pregnant,
- E. A parent,
- F. Possess one or more disabilities, including learning disabilities,
- G. Homeless,
- H. Runaway,
- I. An offender, **or**
- J. *Face serious barriers to employment as identified by local board– i.e.,*
  - 1) Has a substantial abuse problem,
  - 2) Is a victim of domestic violence, **or**
  - 3) Is a victim of sexual assault.

Boone/Winnebago Workforce Investment Board

**Needs Related Payments Policy**

*Policy Adopted by WIB on June 2, 2009*

Applicable Federal Register citations:

**20 CFR 663.815 – What are needs –related payments?**

Needs-related payments provide financial assistance to participants for the purpose of enabling individuals to participate in training and are one of the supportive services authorized by WIA section 134(e)(3).

**20 CFR 663.820 – What are the eligibility requirements for adults to receive needs-related payments?**

Adults must:

- a. Be unemployed,
- b. Not qualify for , or have ceased qualifying for, unemployment compensations; and
- c. Be enrolled in a program of training services under WIA section 134(d)(4).

**20 CFR 663.825 – What are the eligibility requirements for dislocated workers to receive needs-related payments?**

To receive needs related payments, a dislocated worker must:

- a. Be unemployed, and;
  1. Have ceased to qualify for unemployment compensations or trade readjustment allowance under TAA or NAFTA-TAA; and
  2. Be enrolled in a program of training services under WIA section 134(d)(4) by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker’s eligibility as a dislocated worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short-term layoff will exceed 6 months; or
  3. Be unemployed and did not qualify for unemployment compensation or trade readjustment assistance under TAA or NAFTA-TAA.

**20 CFR 663.830 – May needs-related payments be paid while a participant is waiting to start training classes?**

Yes, payments may be provided if the participant has been accepted in a training program that will begin within 30 calendar days. The Governor may authorize local areas to extend the 30 day period to address appropriate circumstances.

**20 CFR 663.840 –How is the level of needs-related payments determined?**

- a. The payment level for adults must be established by the Local Board.
- b. For dislocated workers, payments must not exceed the greater of either of the following levels:
  1. For participants who were eligible for unemployment compensation as a result of the qualifying dislocation, the payment may not exceed the applicable weekly level of the unemployment compensation benefit; or
  2. For participants who did not qualify for unemployment compensations as a result of the qualifying layoff, the weekly payment may not exceed the poverty level for an equivalent period. The weekly payment level must be adjusted to reflect changes in total family income as determined by Local Board policies. (WIA sec. 134(e)(3)(C).)

Applicable State Policy:

**WIA Policy Letter No. 07-PL-35** – issued August 29, 2007

**Participant Eligibility**

Adult Eligibility:

- a. Be unemployed,
- b. Not qualify for , or have ceased qualifying for, unemployment compensation; **and**
- c. Be enrolled in a program of training services under WIA section 134(d)(4).
- d. **Current family income, includes all sources (UI, TRA, SSI, SSDI, etc), does not exceed 100% of the LLSIL.**

- e. **Complete a Financial Needs Assessment to determine Needs Related Payment need.**
- f. **Student must maintain satisfactory progress of a C average or above.**

## Dislocated Worker Eligibility:

- a. Be unemployed, and
  - 1. Have ceased to qualify for Unemployment Insurance (UI) compensation or Trade Readjustment Allowance (TRA) under Trade Adjustment Act (TAA) or North American Free Trade Agreement-Transitional Adjustment Assistance (NAFTA-TAA) (**Note: Dislocated workers who received and exhausted TRA benefits are not eligible unless laid off from a new event.**) ; **and**
  - 2. Be enrolled in a program of training services under WIA section 134(d)(4) by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short-term layoff will exceed 6 months.
- OR
- b. Be unemployed, and
  - 1. Did not qualify for unemployment compensation or trade readjustment assistance under TAA or NAFTA-TAA; **and**
  - 2. Be enrolled in a program of training services under WIA section 134(d)(4) by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short-term layoff will exceed 6 months.
- c. Customer cannot be receiving UI, State Training Benefits, On-the-Job Training, TRA, or Relocation Allowances.
- d. **Current family income, includes all sources, (UI, TRA, SSI, SSDI, etc), does not exceed 100% of the LLSIL.**
- e. **Complete a Financial Needs Assessment to determine Needs Related Payment need.**
- f. **Student must maintain satisfactory progress of a C average or above.**

If these eligibility requirements are met, individuals may be awarded needs related payments from WIA funding prior to the start date of training classes for the purpose of enabling them to participate in program of employment and training services that begin within thirty (30) calendar days. At that point or sooner, as appropriate, all participants must be enrolled in *Training Services* in *IWDS* .

**Payment Determination**

- a. The level of needs-related payments made to Adults may not exceed the equivalent weekly amount of the LWIA's annual 100% LLSIL for a family of one.
- b. The level of needs-related payments made to Dislocated Workers shall not exceed the greater of:
  - 1. The applicable weekly level of Unemployment Insurance compensation (for participants who were eligible for unemployment insurance as a result of a qualifying dislocations); or
  - 2. If the worker did not qualify for unemployment insurance compensation, the weekly payment may not exceed the poverty level for an equivalent period.
- c. The week payment level must be adjusted to reflect changes in total family income. Monthly, or more often if necessary, verifications of income and training will be required to maintain eligibility. Eligibility may be re-determined at any time based on the verifications.

**Administration and Oversight**

- a. A copy of any UI entitlement decision or confirmation of UI benefits being exhausted will be maintained in each customer file.
- b. A copy of the requests for training classes for each period of training (quarter, semester, block, class, etc.) will be maintained in each customer file. A copy of the customers Individual Training Account (ITA) will be used as documentation.
- c. Verification of enrollment/registration, participation, grades, and completion of training classes (confirmation from Registrar's office and course instructor) will be maintained in each customer file. A copy of each class

schedule and grades will be maintained in each customer files and will be used documentation. Monthly verifications of attendance and training progress will be reviewed.

- d. Each customer determined eligible and receiving Needs Related Payments (NRPs) will have signed a copy of this policy as a testament to his/her understanding of the requirements and instruction.
- e. All eligibility will be documented and maintained in the customer file.
- f. A comprehensive reporting system of all NRPs will be maintained and quarterly internal monitoring will be administered.
- g. A Needs Related Payments Analysis form and Weekly Verification of Income & Training forms will be completed and maintained in the customer file.

### **Fraud**

- a. All cases of fraud or suspected fraud will be forwarded to the appropriate legal authorities for prosecution per WIA Policy Letter No. 06-PL-28.
- b. In the event of fraudulent activity, all payments to the fraudulent party will cease and all funds paid will be recovered.
- c. To prevent fraudulent payment activity LWIA staff will:
  1. Perform a cross check with UI to ensure that participants are not receiving UI, TRA, and State Training Benefits while receiving NRPs. Staff will also ensure that participants are not enrolled and participating in On-the-Job Training (OJT) while receiving NRPs.
  2. All training participation will be verified before payments are authorized.
  3. Fraud will be immediately reported and investigated. The collection process from appropriate sources will be initiated immediately as applicable.
- d. NRPs have been classified as non-taxable income by the Internal Revenue Service (IRS).

*The following attachments are not included with this material but are attached to the separate copies of this policy.*

**Attachments – *Needs Related Payments Analysis Form and Instructions*  
*Needs Related Payments Weekly Verification of Income & Training and Instructions***

**Boone and Winnebago Counties Workforce Investment Board**  
**Workforce Investment Act (WIA)**  
**Incumbent Worker Training Policy**

*Policy adopted by WIB on 8/4/09*

**Purpose**

This policy provides information and guidance on implementing the State-approved waiver granting authority to local workforce investment boards to transfer up to ten percent (10%) of adult and dislocated worker Workforce Investment Act (WIA) allocations to support incumbent worker training programs.

**References**

- WIA Policy Letter No. 07-PL-33, Change 1
- Workforce Investment Act of 1998, 117(e), 118©, and Section 134(a)(3)(iv)(I)
- Workforce Investment Act Final Rule; Section 661.345, 665.220, 665.268, and 667.268
- 29 CFR 97.24
- PY'00 WIA PL 00-14, Pre-Award Survey for Relocating Establishments (December 28, 2000)
- PY'01 WIA PL 01-31 change 2. Reporting of Obligations and Re-allotment under the Workforce Investment Act (WIA) (March 11, 2004)
- WIA Policy Letter No. 07-PL-41 Change 1, Local Plan Modifications (October 29, 2008)
- U.S. Dept. of Labor Waiver Approval Letter (July 12, 2005)
- U.S. Dept. of Labor Waiver Approval Letter (February 26, 2008)

**Background**

Per the Policy Letter NO. 07-PL-33, Change 1: These programs will assist Economic Development Regions and/or Local Workforce Investment Areas in developing a full continuum of training services that address the needs of the existing workforce, the unemployed, underemployed, and new entrants to the labor force. Training allowable will focus on occupations that are in high growth areas, based on labor market data, industry, and economic development.

Per the Boone and Winnebago Counties Workforce Investment Area Strategic Plan, utilizing WIA incumbent worker training is an opportunity to address skill gaps, prevent dislocation, and open entry level positions for WIA participants.

**Definitions**

- |                  |  |
|------------------|--|
| Employed Worker  | An individual who is employed and is determined to be in need of intensive service to obtain or retain employment.   |
| Incumbent Worker | a) An individual (or group of individuals) with an employment relationship with a participating employer or group of participating employers in a targeted industry (as sited in the local plan); and<br>b) An individual who is receiving upgraded skills training: |

- To increase his or her skills in an occupation in which the individual is already an incumbent; or
- To prepare the worker for entry into a new occupation within the targeted workforce (i.e., the workforce of the participating employer or group of employers).

**Participating Employer**

The primary customers for incumbent worker training services are the participating employers or group of employers, as cited in “a” above. Such employers must be actively participating in a WIA funded incumbent worker training program. And, such employers must be industry focused. For example, a group of employers may be associated due to supply relationships, such as an original equipment manufacturer (OEM) and the firms in the OEM’s supply chain. Or a group of employers may be associated through an industry-related organization.

**Targeted Industries**

Targeted industries in the Boone and Winnebago Counties Workforce Investment Area are healthcare, manufacturing, transportation/warehousing and logistics, information technology, and green technology.

**Policy**

Training is primarily delivered in two ways; one is through group instruction, the other through off the shelf programs that lead to a certificate or degree. Due to the variance in costs of training and to who is responsible for the costs incurred, two separate criteria for approving training are being introduced. All projects requests exceeding \$10,000 in grant resources will be reviewed for approval by a team. This team will consist of the business services members responsible for incumbent worker training and a member of the WIB Board.

➤ ***Group Instruction:***

**Employer Match**

Percentage of employer match will be based on the size of the employer. Match can be costs toward curriculum development, training materials and supplies, vendor/contractor trainer costs, travel expenses for trainers, training facility costs, wages and fringe benefits of trainees while in training, and fees for training certifications.

<b>Employer</b>	<b>Number of Employees</b>	<b>Percentage Match Required</b>
Large Employer	101+	50%
Mid-sized Employer	51-100	25%
Small Employer	1-50	10%

\*Employers will be required to report monthly until the project is complete.

\*Employers/Trainers will be required to bill within 20 days of the completion of training. Billing may be required monthly for projects which exceed more than one (1) month of training. Payments to be reimbursed will require employers/trainers to provide **all** required supporting documentation. Payments **will not** be made for incomplete requests or requests not provided on a timely basis.

(\*Details will be defined in the Operating and Billing Procedures Manual.)

**Incumbent Worker Grant Award**

Grants must be awarded prior to start of training. Grants can be used for costs for training, instructor's fees, and materials. Training for Lean Manufacturing will not exceed \$5000.00 in incumbent worker grant funds per employer. The Business Services Unit will approve vendors proposed by employers to deliver training to ensure a competitive procurement and justification for training is complete.

➤ ***Individual Instruction:***

**Employer Match**

Percentage of employer match will be 25%, regardless of the size of the employer. Match can be delivered through tuition reimbursement or commitment to projects approved by the Board.

**Incumbent Worker Grant Award**

Grant awards will not exceed 75% of the cost of training. The amount of tuition per individual is not to exceed \$10,000 in incumbent worker funds per year per individual. The grant can be for costs toward tuition, fees, materials, and supplies directly related to training.

Vendors to deliver training will be based on customer choice and an off-the-shelf price.

**Reporting**

Projects will be reported on a monthly basis to the Program Oversight Committee and the Organizational Development Committee.