

# PARTNER WORK

## EARN & WORK READY ON-THE-JOB TRAINING POLICY

### Purpose

The purpose of this policy is to articulate how On-the-Job Training (OJT) funds are to be administered in Allegheny County under Temporary Assistance for Needy Families (TANF) Employment and Training programs: Employment Advancement and Retention Network (EARN) and Work Ready.

### Affected Parties

This policy applies to all Allegheny County EARN and Work Ready participants who will participate in an OJT. This policy also applies to employers participating in an OJT.

Allegheny County EARN and Work Ready program staff and Partner4Work staff are responsible for implementing this policy.

### References

- EARN Manual PY 23-24
- Work Ready Manual PY 23-24
- [TANF Final Rule](#)

### Definition of Key Terms

**On-the-Job Training (OJT):** OJT is defined as training in the public or private sector that is given to a paid employee while they are engaged in productive work and that provides knowledge and skills essential to the full and adequate performance of the job.

- OJT provides public or private sector employers with a wage subsidy for a negotiated period of time.
- To use OJT as an EARN activity, program providers must enter into a written agreement with the employer.

### Participant Eligibility

An individual enrolled in Allegheny County EARN & Work Ready programs may qualify to participate in an OJT if, after an interview, evaluation or assessment, and career planning, provider staff have determined that the individual:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services only;
- Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- Has the skills and qualifications to participate successfully in training services; and

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- Is unable to obtain grant assistance from other sources to pay for the cost of such training

## Employer Eligibility

Employers may qualify to participate in an OJT if it is determined that they meet the following criteria:

### Eligible Employer Types

- Private-for-profit business;
- Private non-profit organization; or
- Public sector employer

### Employer Restrictions

An employer will **not** be eligible to participate in an OJT if:

- The employer has any other individual on layoff from the same or substantially equivalent position.
- The OJT would infringe upon the promotion of or displacement of any currently employed worker or create a reduction in their hours.
- The same or a substantially equivalent position is open due to a hiring freeze.
- The positions are for seasonal employment.
- The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.
- The position does not meet the standard for employment as defined by the PA Department of Human Services.
- The employer has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.

### Employer Assurances

- Employers are expected to provide training, guidance, and direction to help employees obtain unsubsidized employment.
- Employer certifies that OJT funds will not be used to assist, promote or deter union organizing.
- Employer certifies that any funds provided under this Agreement shall not be used to directly or indirectly aid in the filling of a job opening which is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage.
- Conditions of employment and training will be in full accordance with all applicable federal, state, and local laws and ordinances (including but not limited to anti-discrimination, labor and employment laws, environmental laws or health and safety laws).
- Employers, if eligible and offered, will be required to complete an on-the-job training agreement with the TANF EARN or Work Ready provider. Employers must understand and abide by all the terms of the agreement along with the requirements in this policy.

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## OJT Program Requirements

### Required Program Criteria

An OJT program must meet the following criteria to receive EARN or Work Ready funding:

- The training is provided by an employer to a paid participant while engaged in productive work in a job and the training must:
  - Provide knowledge or skills essential to the full and adequate performance of the occupation;

OJT is intended to place participants in occupations that improve their prospects for employment that leads to self-sufficiency. OJT contracts will generally not be written for low skill jobs that generally would require little or no training.

### Occupational Eligibility

OJT dollars should be prioritized for programs leading to employment in a High Priority Occupation (HPO) and/or an in-demand industry sector. An OJT must lead to employment opportunities that enable the participant to become economically self-sufficient and contribute to the occupational development and upward mobility of the participant. The current Partner4Work HPO List is available at [Partner4Work.org](http://Partner4Work.org).

### OJT Length

The maximum time frame for an OJT is **six months**. Duration of an OJT is a function of training needed, not the maximum allowed under this policy. EARN and Work Ready staff should consult with the employer and utilize the Occupational Information Network (ONET) Specific Vocational Preparation Range (SVP) to determine the appropriate occupational training needed. Using the SVP provided by ONET, the following duration times are recommended in addition to the participants past skill and experience.

LEVEL	TIMEFRAME
Level 1	<1 month
Level 2	1 month
Level 3	>1 month - 3 months
Level 4	>3 months - 6 months
Level 5	>6 months
Level 6	>6 months
Level 7	>6 months
Level 8	>6 months
Level 9	>6 months

### OJT Funding Levels

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Employers will be reimbursed 50 percent of a participant's wage per hour. While participants may be paid a higher hourly wage, employers will only receive 50 percent reimbursement for up to \$20 an hour of a participant's wage. The maximum amount a company may receive is \$10,000 per trained individual. Partner4Work will consider an increase in the reimbursement rate (up to 75 percent) and funding cap taking into consideration one or more of the following factors:

- Size of the employer(s) with an emphasis on small businesses;
- The characteristics of the participants taking into consideration whether they are individuals with barriers to employment;
- The quality of employer-provided training and advancement opportunities. For example, if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential;
- Wage and benefit levels of employees (at present and anticipated upon completion of training);
- Other relevant factors, as appropriate.

EARN/WR staff must submit a request for Partner4Work's approval to increase the reimbursement rate to 75 percent or to increase the funding cap, describing how the OJT meets one or more of the above criteria.

## **Policy Exceptions:**

Under limited circumstances, Partner4Work may grant exceptions to requirements within this policy. Requests for exceptions may be submitted to [policy@partner4work.org](mailto:policy@partner4work.org). Requests must be made using the Policy Exception Form at [www.partner4work.org](http://www.partner4work.org).

Exception requests will be reviewed based on their allowability under any applicable legislation, regulation, and policy. Partner4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

**Effective Date:** \_\_\_\_\_ \_\_, 2023