

# BUILDING PATHWAYS TO INFRASTRUCTURE JOBS PROGRAM POLICY GUIDE



EFFECTIVE DATE: MARCH 22, 2024  
PARTNER4WORK PITTSBURGH, PA  
LAST COLLECTIVELY REVIEWED: MAY 1, 2025

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## OVERVIEW

### PARTNER4WORK

Partner4Work (P4W), formerly Three Rivers Workforce Investment Board, was established by the Workforce Investment Act of 1998 (WIA) and was later reauthorized by the Workforce Innovation and Opportunity Act in 2014 (WIOA). In its 25+ years, Partner4Work has delivered innovative solutions and supported local partners to develop a thriving workforce in Allegheny County and the City of Pittsburgh. From its initial focus as a small think tank, P4W has evolved its focus to include the development of strategic and systemic workforce solutions and funding key workforce partners including PA CareerLink® Allegheny County/Pittsburgh. With a budget comprised of public and private workforce funds, Partner4Work delivers a comprehensive portfolio of programs and initiatives to meet the current and future needs of employers and job seekers.

#### **Our Vision**

Partner4Work envisions a thriving and prosperous community, where all residents have access to expansive career opportunities and all businesses have access to a talented workforce.

#### **Mission**

To develop a thriving workforce, Partner4Work drives and delivers strategic investments, provides expertise, and creates opportunities for businesses, job seekers, agencies, and policymakers in Allegheny County and the City of Pittsburgh.

To find out more about Partner4Work: [www.partner4work.org](http://www.partner4work.org)

## PROGRAM BACKGROUND

The Department of Labor (DOL) Building Pathways to Infrastructure Jobs Grant Program invests in public-private partnerships to develop, implement, and scale worker-centered sector strategy training programs in H-1B- or specialized professional- industries and occupations critical to meeting the goals of the Bipartisan Infrastructure Law (BIL). [This legislation](#) seeks to help ease inflationary pressures and strengthen supply chains; make our communities safer and our infrastructure more resilient to the impacts of climate change and cyber-attacks; drive the creation of good-paying union jobs with high labor standards that can be accessed by all workers, especially those from underserved communities; and grow the economy sustainably and equitably for decades to come.

Through this award, P4W, alongside Southwest Corner Workforce Development Board, Westmoreland-Fayette Workforce Investment Board, and Tri-County Workforce Investment Board, will expand well-established Information Technology and [Advanced Manufacturing](#) industry partnerships into a nine-county area, focused on occupational pathways that support infrastructure-related jobs in clean energy and broadband, with an emphasis on serving both rural communities and historically underrepresented populations. This program aims to develop and diversify the talent pipeline necessary to support the infrastructure sectors.

## MANUAL PURPOSE

This manual provides policy guidance for Partner4Work (P4W) partners and subgrantees delivering training and related services funded through the DOL Building Pathways to Infrastructure Jobs Program in the counties of Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Washington, and Westmoreland. These policies are to be used when determining eligibility and providing grant-funded services.

## AUDIENCE & RESPONSIBLE PARTIES

These policies apply to all Building Pathways to Infrastructure Jobs [participants](#) and individuals interested in enrolling in this program across Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Washington, and Westmoreland Counties.

Staff of Partner4Work, Southwest Corner Workforce Development Board, Westmoreland-Fayette Workforce Investment Board, Tri-County Workforce Investment Board, and subrecipient partner-agencies are responsible for implementing these policies.

## CO-ENROLLMENT

This policy guide sets requirements for services funded by the Building Pathways for Infrastructure Jobs grant. Individuals participating in the DOL Building Pathways Program will be co-enrolled in WIOA Title I-B services, as appropriate. Providers should refer to their local WIOA policies for any activities supported through WIOA.

**Note:** Allegheny County and Pittsburgh CareerLink® staff should follow this guide for all participants co-enrolled in WIOA. However, this guide does not replace requirements for WIOA Adult and Dislocated Worker eligibility and Priority of Service policies.

## ELIGIBILITY

This section ensures all [participants](#) across the nine-county region who receive services funded by the DOL Building Pathways to Infrastructure Jobs Program are eligible for and registered to receive those services.

## BASIC PARTICIPANT ELIGIBILITY

DOL Building Pathways [participants](#) must meet basic eligibility requirements. These include:

- Be 18 years of age or older;
- Not currently enrolled in secondary school;
- Authorized to work in the US;

- Reside in the counties of Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Washington, and Westmoreland.

## ADDITIONAL ELIGIBILITY CRITERIA

This program will train participants whose employment status, when determined eligible, is one of the following, as defined for the purposes of this program:

- **Underemployed:** This term refers to individuals who are not currently connected to a full-time job commensurate with the individual’s level of education, skills, or wage and/or salary earned previously, or who have obtained only episodic, short-term, or part-time employment.
- **Unemployed:** An unemployed worker is an individual who is without a job and is available to work.
- **Incumbent Worker:** This term refers to individuals already employed, either with an employer partner or another employer, at program enrollment, but who need training to upgrade their skills to secure full-time employment, advance in their careers, or retain their current positions in H-1B occupations and industries.

## TARGET POPULATIONS

In an effort to develop and diversify the talent pipeline to support American infrastructure, the Building Pathways Program specifically targets populations that have historically been marginalized, underrepresented, and underserved within technology and advanced manufacturing sectors. The populations targeted under this program include:

- [Opportunity youth](#)
- People of color
- Women
- People with disabilities
- [Justice-impacted](#) individuals
- Residents of [rural communities](#) throughout the nine-county service area.

## VETERAN PRIORITY

US code requires partners to provide [priority of service](#) to veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by DOL.

**COVERED PERSON:** “Covered Person” – as defined in section 2(a) of the Jobs for Veterans Act (JVA) of 2008 means a veteran or eligible spouse. A veteran is defined as a person who served at least one day in the active military, naval, or air service and who was discharged under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

**ELIGIBLE SPOUSE:** “Eligible Spouse” - as defined in section 2(a) of the JVA means the spouse of any of the following individuals:

- 1) Any veteran who died of a service-connected disability;
- 2) Any member of the Armed Forces serving on active duty who, at the time of application for service under this section, is listed in one or more of the following categories and has been so listed for a

total of more than 90 days: (I) missing in action; (II) captured in the line of duty by a hostile force or (III) forcibly detained or interned in line of duty by a foreign government or power;

- 3) Any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veterans Affairs;
- 4) Any veteran who died while having a disability, as indicated in bullet (3) of this definition was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., category 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

## REQUIREMENTS

Under this program, a covered person is entitled to [priority of service](#) if the person otherwise meets the eligibility requirements for participation.

Individuals eligible for priority of service shall be identified at the point of entry, whether that is PA CareerLink® (PA CL®) site, online self-service application, or other WIOA Title I Adult provider location. Upon identification they shall be notified of:

1. Their entitlement to priority of service;
2. The full array of programs and services available to them;
3. Any applicable eligibility requirements for those programs and services.

PA CareerLink® or other provider staff must ensure individuals who qualify for [priority of service](#) receive career and training services before other non-covered individuals and receive first priority on any waiting lists that are maintained for training slots. However, once a participant is enrolled in a workshop, training, or service, they may not be displaced by an individual qualified for priority of service.

**Note:** Individuals co-enrolled with WIOA Title I must follow priority of service policy requirements for WIOA.

## APPLYING PRIORITY OF SERVICE

Eligibility criteria must be met by all participants. Therefore, a veteran or eligible spouse must first meet all of the statutory eligibility criteria in order to be considered eligible for: a) enrollment in the program; b) receipt of priority for enrollment in the program; and c) priority for receipt of services.

In addition to the eligibility criteria that all participants are required to meet, the Building Pathways to Infrastructure Jobs Program has discretionary priorities that establish a rank order to be observed in enrolling or serving participants (i.e. target populations). Priority interacts with the program's target populations and eligibility criteria in the following way:

1. Veterans/eligible spouses must receive the highest priority.
2. Non-covered persons within the target group receive the second level of priority.
3. Non-covered persons outside the targeted group receive the third level of priority.

## TRAINING SERVICES

Training services available through the Building Pathways Program will be coordinated with existing technology and [advanced manufacturing](#) registered apprenticeship programs (RAPs) that support high-demand career pathways in Southwestern PA's growing clean energy and broadband sectors.

## REGISTERED APPRENTICESHIP PROGRAMS

Apprenticeships are innovative training programs that combine structured classroom learning, known as Related Technical Instruction (RTI), and [on-the-job training](#). Components of registered apprenticeships include:

- **Paid Job** - Apprentices are paid employees who produce high-quality work while they learn skills that enhance their employers' needs.
- **Wage Progression** - An apprentice's wage increases as they progress through their training and gain new skills.
- **On-the-Job Learning** - Develops skilled workers through structured learning in a work setting.
- **Classroom Learning** - Improves job-related skills through education in a classroom setting (virtual or in-person).
- **Mentorship** - Provides apprentices with the support of a skilled worker to assist and enhance critical hands-on-learning.
- **Credentials** - Offers a portable, nationally recognized credential to be issued at the completion of the program.

For the purposes of this program, training will be offered through six pre-determined RAPs that have a successful track record of equitably delivering high-quality, "earn-while-you-learn" models which reduce opportunity costs for workers and lead directly to employment in targeted occupations. All programs have been approved and registered by the PA Apprenticeship and Training Council (PATC) and provide industry-recognized certifications.

## ADVANCED MANUFACTURING RAPs

The German American Chamber of Commerce (GACC) is the sponsor for registered apprenticeships for [Advanced Manufacturing](#) for this grant. GACC represents a broad consortium of advanced manufacturing employers in urban, rural, and suburban Southwestern PA.

## CAD/CAM TECHNICAL DESIGNER

CAD / CAM Technical Designers utilize their extensive software knowledge to produce complex projects involving 2D images (surface modeling) and 3D images (solid modeling). They are able to analyze a problem using their mathematical and engineering background and come up with a creative solution.

**OJT:** 5000 HRs

**RTI:** 500 HRs

## OUTCOMES

1. Associate's degree in computer-aided Drafting & Design Technology
2. Journeyman certification issued by the PA Dept. of Labor & Industry
3. German Apprenticeship Certificate.

## MECHATRONICS TECHNICIAN

Mechatronics technicians apply their knowledge of engineering to solve technical problems and maintain automated mechanical equipment and are highly involved with maintaining high-tech machines such as robots, CNC machining, factory automation equipment and a range of complex platforms.

**OJT:** 6000 HRs

**RTI:** 550 HRs

### OUTCOMES

1. Mechatronics Technician Certificate
2. Associate's degree
3. Journeyman certification issued by the PA Dept. of Labor & Industry
4. German Apprenticeship Certificate

## POLYMER TECHNOLOGY PROCESS TECHNICIAN

A Polymer Process Technician's primary job is to set up, monitor and troubleshoot plastic injection-molding machines. This requires specialized knowledge of materials, specific tools, and equipment.

**OJT:** 6000 HRs

**RTI:** 550 HRs

### OUTCOMES

1. Journeyman certification issued by the PA Dept. of Labor & Industry
2. German Apprenticeship Certificate

## ELECTRIC VEHICLE (EV) AUTOMOTIVE TECHNICIAN

GACC's Electric Vehicle (EV) Automotive Technician apprenticeship was developed in partnership with the German Handwerkskammer and IHK (which includes Mercedes, VW Group, BMW).

**OJT:** 2000 HRs

**RTI:** 200 HRs

### OUTCOMES

1. Journeyman certification as an EV Automotive Technician
2. EV Automotive College Certification
3. Germany's EV Automotive Technician Certification

**Note:** Participation in this registered apprenticeship program is contingent upon registration approval by Pennsylvania's State Apprenticeship Agency (SAA).

## TECHNOLOGY RAPs

Fortyx80, RAP sponsor for the Software Analyst and Cyber Security Support Technician apprenticeships, is the sister organization to The Pittsburgh Technology Council (PTC), a trade organization with over 1,000 member companies from a wide range of industries within the tech sector, including IT, robotics, data analytics, life sciences, and others.

## SOFTWARE ANALYST

A Software Analyst is tasked with updating, testing, and enhancing software products under the supervision of engineers and architects. The focus of this role is on improving existing products and applications by adding features, finding and eliminating bugs, and improving efficiency.

**OJT:** 2000 HRs

**RTI:** 480 HRs

### OUTCOMES

1. Journeyman certification issued by the PA Dept. of Labor & Industry

## CYBER SECURITY ANALYST

A Cybersecurity Analyst is tasked with hardening systems against external intrusion and investigating security breaches within IT systems. Also generally referred to as an Information Security Analyst, apprentices in this role may branch into Penetration Testing/Ethical Hacking or specialized roles within a Security Operations Center.

**OJT:** 2000 HRs

**RTI:** 380 HRs

### OUTCOMES

1. Journeyman certification issued by the PA Dept. of Labor & Industry
2. Certifications in CompTIA IT Fundamentals, CompTIA Security+, CompTIA CySA+, and CompTIA Network+

## RAP FUNDING MECHANISMS

There are several ways in which training funds may be used to support participation in registered apprenticeships models, utilizing a combination of classroom training and [on-the-job training](#).

Program providers will use interviews, evaluations, or assessments to determine training suitability, which relates to a participant's assessed ability and perceived commitment to attend training activities, successfully complete a training program, and to obtain and retain employment related to training.

1. **Individual Training Accounts (ITA):** An ITA is a payment agreement established on behalf of a participant with a training provider. Eligible participants may receive an ITA to attend an approved training program of their choice, provided it is one of those listed above.
2. **On-the Job Training (OJT):** OJT allows employers to offer training to newly hired employees while engaged in productive work by subsidizing part of the participant's wages during the OJT period, with the expectation that the participant will continue to work for the employer once the OJT is completed.
3. **Customized Job Training (CJT):** CJT is training designed to meet the requirements of an employer or group of employers. To receive CJT funding, employers must commit to continued employment of participants upon successful completion of the CJT program and to paying a significant portion of the CJT cost.
4. **Incumbent Worker Training (IWT):** IWT is training intended to meet the requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off

employees by assisting the workers in obtaining the skills necessary to advance. An incumbent worker is an individual who has an established employment history with the same employer for a period of six months or more.

## INDIVIDUAL TRAINING ACCOUNTS (ITAs)

An “**individual training account**” is a funding mechanism through which eligible individuals can access quality training to help obtain employment in high demand occupations.

### ITA FUNDING

Participants may receive a maximum of \$8,000 per ITA. ITAs are not guaranteed to any participant and are dependent on funding availability and a participant’s suitability for training.

*For Partner4Work (Allegheny County/City of Pittsburgh) training agreements, ITA funding distribution will be based on training program enrollment/start and program completion. Training providers will receive 50% of the total ITA funding amount when a participant successfully enrolls into and begins an approved training program. Training providers will receive the remaining 50% of the total ITA funding amount when a participant successfully completes the approved training program.*

### **Maximum Duration of an ITA**

ITAs will be valid for up to two (2) years.

## WORK-BASED TRAINING

Work-based training (CJT, IWT, and OJT) is training developed in agreement with an employer or group of employers for which a portion of the employer’s training costs are reimbursed. Work-based training is designed to train new hires or current workers of an employer(s) while the participant earns a wage on-the-job.

### EMPLOYER ELIGIBILITY

Employers may qualify to participate in a work-based training if it is determined that they meet the following criteria:

#### **Allowable Occupations:**

- Advanced Manufacturing
- Information Technology
- Professional, Scientific, and Technical Services

#### **Allowable Sectors:**

- Renewable Energy
- Transportation
- Broadband Infrastructure

#### **Eligible Employer Types:**

- Private-for-profit business; or
- Private non-profit organization.

**Note:** Participant OJT placements may only be reimbursed for private for-profit and nonprofit sectors. While the grant allows for public sector OJT placements, they are not allowed to be reimbursed for any portion of the training costs with grant funds.

### **Employer Restrictions:**

An employer will not be eligible to participate in a work-based training if:

- The employer has any other individual on layoff from the same or substantially equivalent position.
- The training 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 is not full time, i.e. minimum of 32 hours per week.
- The employer has previously exhibited a pattern of failing to provide training 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:**

With assistance from PA CareerLink® or LWDB staff, participating employers must guarantee that:

- All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include UC coverage where the employer is normally required to provide such coverage to its employees.
- The position provides the participant benefits per company policy (i.e. insurance, paid leave, profit sharing) and any benefits required by law.
- Employees who have financial responsibilities related to the receipt and disbursement of funding under the Agreement shall be covered by fidelity bonding.
- The training to be provided will be in accordance with WIOA 181(a)(1)(A) and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
- The employer agrees to cooperate with monitoring efforts as required by federal funding and adhere to all other applicable local, state, and federal rules and regulations.
- Funds are not used to directly or indirectly assist, promote, or deter union organizing.
- The employer agrees to respond to LWDB and PA CareerLink® staff requests for wage and retention information of participants.
- If the participating employer(s) has recently relocated, resulting in the loss of employment of any employee of such business at the original location in the U.S., on-the-job training contracts may not be granted to the employer until after 120 days have passed since the relocation.

### **ON-THE-JOB TRAINING (OJT)**

On-the-Job Training encourages employers to hire or up-grade an eligible individual, providing the skills and competencies for a position the participant would not qualify for otherwise. While the job-seeker benefits by earning a wage while learning in a hands-on environment, the employer benefits through increased staff capacity and productivity. OJT provides the employer with partial wage-rate reimbursement in exchange for self-designed, occupational training and related supervision.

### **OJT Funding**

Employers will be reimbursed up to 50 percent of a participant's wage per hour. While participants may be paid a higher hourly wage, employers will only receive a maximum 50 percent reimbursement for an individual's wage up to \$24 an hour, up to 40 hours per week. The maximum an employer may receive is \$10,000 per individual.

### **OJT Training Duration**

The period of reimbursement should be an adequate length to ensure the participant has acquired the technical skills needed for employment, but no longer than 12 months.

### **CUSTOMIZED JOB TRAINING (CJT)**

CJT is designed to meet the requirements of an employer or group of employers. CJTs will be prioritized with employers intending to train five or more participants during a calendar quarter (three-month period) for the same or similar position. CJTs are intended to train each participant in a cohort for the same skill set rather than individualized occupational skills.

### **CJT Funding**

Employers will be reimbursed up to 50 percent of the cost of training. The maximum amount a company may receive is \$8,000 per trained individual.

Participating employers must pay the remaining percent of the cost of the CJT. This payment can be in cash or in-kind services. CJT funding cannot be used for the wages of incumbent workers while they participate in training but may be used to fund the cost of administering the training, including the wages of the trainer. The wages of unemployed individuals hired because of CJT funding availability are eligible to be reimbursed through CJT funding.

### **INCUMBENT WORKER TRAINING**

IWT is intended to meet the requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

### **Additional Participant Eligibility**

1. Be employed;
2. Meet the Fair Labor Standards Act for requirements for an employer-employee relationship;
3. Have established employment history with employer for six (6) months or more;
  - a. Exception: In the event that the incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for 6 months or more as long as a majority of the employees being trained do meet the employment history requirement.

### **IWT Funding**

Employers participating in IWT are required to pay a percentage of the non-federal share of the cost of providing training to their incumbent workers; incumbent worker salaries paid by the employer are not allowable costs to be reimbursed under this grant. A maximum reimbursement of \$8,000 per trained worker is permitted under this policy.

## PROGRAM SERVICES

DOL's Building Pathways to Infrastructure Jobs program provides a range of training and education services that lead to skilled jobs in infrastructure-related occupations and sectors. An innovative mix of services include assessment, coaching and counseling, supportive services, and occupational skills training that leads to recognized postsecondary credentials and employment. Furthermore, P4W and our partners incorporate a strong worker-centered assessment component that allows for a customization of services and training to meet the needs of the participants to get a quality job, retain their employment, or advance to a new position in the targeted sector.

**Note:** All program services (supportive services, follow-up services, etc.) are to be provided in coordination with PA CareerLink®.

## SUPPORTIVE SERVICES

Supportive Services are designed to provide participants with the resources necessary to enable their participation in career and/or training services. This section ensures appropriate and necessary [supportive services](#) to assist program [participants](#) are available.

### SUPPORTIVE SERVICE REQUIREMENTS

The following are supportive service eligibility requirements for Building Pathways participants:

- Participant must be participating in education and training activities provided through the Building Pathways to Infrastructure Jobs Program;
- Participant must be unable to obtain supportive services through other programs providing such services.

PA CareerLink® staff will meet with each participant to assess the need for supportive services. Each participant will be given individualized case management services and plan development in order to eliminate possible dependency on supportive services. Supportive services awards must be based on individual participant needs and plan development. This information must be properly documented in case notes in the Commonwealth Workforce Development System. Supportive services may only be awarded when necessary to enable participation in career and/or training services. A supportive service shall qualify as "necessary to enable an individual to participate in and successfully complete education and training activities" if staff determine, following a needs assessment and IEP development, that a supportive service would help an individual to successfully participate in education and training activities. P4W funds must be used in accordance with the requirements of the Federal Uniform Guidance and all other guidance and regulations applicable to the funding source.

Building Pathways funds are intended to be used to provide supportive services when they are not readily available through other resources and service providers. PA CareerLink® staff are responsible for coordinating services and providing referrals to other state and local agencies offering supportive services. Supportive service funds shall be permitted, in accordance with this policy, if it is determined by program staff that a referral to other resources or service providers is not possible or cannot be made within the timeframe needed by the participant.

**Note:** WIOA funds must only be used when Building Pathways funds have been exhausted for co-enrolled participants in Allegheny County and the City of Pittsburgh.

## SUPPORTIVE SERVICE AVAILABILITY

Equipment, tools, and clothing/uniforms required for apprenticeship will be provided by registered apprenticeship sponsors or by participating employers.

Additional supportive services, if deemed necessary by PA CareerLink® staff, include, but are not limited to the list below. PA CL® staff will determine the need for supportive services and monitor the customer's progress and status to assess ongoing need.

- 1) **Transportation** – Supportive services funds may be used to cover certain transportation costs, including:
  - a. Bus passes, not exceeding monthly fare of the respective regional transit system;
  - b. Gas cards, not exceeding \$75 per week;
  - c. Ridesharing (Uber, Lyft, etc.) vouchers, not exceeding \$60 per week. For a ridesharing voucher to be issued to a participant, one or more of the criteria below must be met. Service providers may refer to public transportation schedules or other services (e.g. Google Maps) to verify and document that these criteria are met.
    - i. The overall travel time to/from the destination by public transit would be 1 hour or more in either direction;
    - ii. The public transit route to/from the destination would require more than one transfer in either direction;
    - iii. The final bus stop on the route (to/from) is more than 1/2 of a mile from the destination or does not have a clear pedestrian route to the destination (e.g. lack of sidewalks); or
    - iv. The bus schedule for the route (to/from) the destination would require a wait time of 30 minutes or more at a bus stop or shows no buses running during the required travel time.
- 2) **Driver's license or state identification card:** A participant may receive supportive services funds for one (1) instance of the cost of obtaining a state driver's license or identification card. Supportive service funds may not be used to pay for the costs of fines, penalties, or legal fees associated with obtaining or reinstating a driver's license.
- 3) **Non-employer paid licensing/certification or educational testing fees:** A participant may receive funding for a maximum of two (2) instances of the same license/certification or test utilizing supportive services dollars. PA CL® staff will determine the need for licensing or testing according to employer demand. The staff will make the necessary arrangements with the vendor for payment. The cost of GED testing and/or obtaining GED transcripts may be covered under this supportive services category.
- 4) **Drug Testing and/or TB Testing:** A participant may have one (1) instance of a drug test and/or TB test paid for through WIOA supportive services dollars.
- 5) **Criminal Background Checks and/or Clearances:** A participant may have one (1) instance of obtaining a criminal background check and/or clearances necessary to begin employment and/or education paid through supportive services dollars. This includes one (1) instance of each of the following: Pennsylvania Child Abuse History Clearance, Pennsylvania State Police Criminal Record Checks, and Federal Bureau of Investigations (FBI) Criminal History Background Check.
- 6) **Unions and Registered Apprenticeships Fees:** A participant applying to a union and/or registered apprenticeship may receive assistance for non-employer paid, non-refundable costs required for

initial admittance or participation in the program. These costs may include application fees, initial dues (one month only), and/or required clothing/shoes. Supportive services funds may only be used if the expenses are a requirement for participation in training and/or a reasonable condition of employment.

- 7) **Reasonable accommodations for individuals with disabilities:** Supportive services dollars may only be used as the funding of last resort for these accommodations.
- 8) **Childcare:** Participants may receive support for childcare expenses during hours required for participation when necessary for participation in services. To qualify, participants must first apply for support through the Pennsylvania Department of Human Services (DHS) subsidized childcare program, [Child Care Works](#). The annual income for a [family to be eligible to receive a subsidy](#) is 200 percent or less of the Federal Poverty Income Guidelines (FPIG); work hour, education hour, and child age requirements must also be met.
  - a. Funds may be used to cover childcare costs when participating in this subsidized childcare program, including childcare costs incurred if placed on the waitlist for the program. Supportive services funding may also be used to provide support for childcare expenses for participants who meet income eligibility criteria for Child Care Works (PA's subsidized childcare program), but do not qualify based on other criteria.
  - b. Individuals disqualified from Child Care Works due to family income exceeding 200 percent may still qualify for supportive service funds if the following criteria are met.
    - i. Staff determine such resources are necessary to enable participation; and
    - ii. Participant family income falls under 300 percent of the FPIG.

## FOLLOW-UP SERVICES

Upon completion of apprenticeship and placement in unsubsidized employment, program staff must make follow-up services available to Building Pathways participants. These services, including counseling regarding the workplace, will be offered at least once per quarter for a minimum of 12 months following the first day of employment or the program exit date for participants who have not placed in unsubsidized employment. During follow-up, PAACL® staff will coordinate referrals to state and local agencies for additional supportive services as needed to support job placement and retention.

Provider staff should determine if more frequent follow-up services are needed based on the participant's individual needs and career goals, as documented in their [individual employment plan \(IEP\)](#). Staff must document each follow-up service in the Commonwealth Workforce Development System (CWDS) through both service code entry and case notes.

### **Exceptions**

Exceptions to the follow-up services requirement are permitted if at least one of the following criteria is met:

- Staff have made reasonable attempts to contact a participant at a minimum monthly over a three-month period and the participant has not responded. Each attempt to contact must be documented in CWDS case notes. Attempts must have been made to all phone numbers associated with a participant and through at least one other medium (e.g. email, text messaging, written letter).

- A participant has notified program staff that they no longer need or want follow-up services or contact. This must be documented in CWDS case notes and any written notification from the participant must be kept in their case file.

**Note:** WIOA funding may not be used to pay for supportive services for a WIOA Adult or Dislocated Worker participant during the follow-up period.

## OPERATIONS

### DATA ENTRY & SYSTEM OF RECORD

Data for all enrolled participants will be tracked using the Registered Apprenticeship Partners Information Database System (RAPIDS) and the Pennsylvania Commonwealth Workforce Development System (CWDS).

#### RAPIDS

RAPIDS is a case management system that serves as the data collection point for all DOL Registered Apprenticeship Programs across the United States; apprenticeship sponsors Fortyx80 and GACC are responsible for data entry into RAPIDS.

#### CWDS

PACL® staff will verify eligibility and enter participant data into CWDS, the system of record for participant-level workforce development data in PA. Providers must recognize that CWDS is the system of record for WIOA services in the Commonwealth and agree that all program data will be entered therein. Staff must be fully competent in utilizing CWDS and providing basic guidance regarding CWDS to other service providers within the P4W network, including querying and producing reports from CWDS regarding the PA CareerLink® system.

### CASE MANAGEMENT

Case management is a process of building relationships with participants, understanding clients to the extent that managers can help guide participants and recommend services and training pathways that meet their needs. Case notes must document that there is ongoing contact between the case manager and the participant, that the participant's progress is being tracked, and that the service plan is updated when any change in circumstances, goals, or planned activities and services occurs.

The following requirements apply to case management:

- One case note per client interaction is expected.
- Acronyms, initialisms, and jargon are to be avoided; case notes should be understood by external reviewers.
- Service Plans should be up to date within the last 90 days.
- All entries into CWDS should be completed as soon as possible; any data entry backdated more than 30 days is considered late.

### DOCUMENTATION REQUESTS

A provider's inability to deliver documentation requested by Partner4Work could result in compliance findings if the documentation is not submitted in a timely manner.

## PERFORMANCE INDICATORS & GOALS

Please refer to your contract for performance outcome measures.

## PERSONALLY IDENTIFIABLE INFORMATION

As part of grant activities, staff may have access to program participant or staff PII. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, or other sources. Federal law and federal policies require that PII and other sensitive information be secured and protected at all times.

### KEY TERMS

**PERSONALLY IDENTIFIABLE INFORMATION:** OMB defines “Personally Identifiable Information” (PII) as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

The Department of Labor has defined two types of PII, “protected PII” and “non-sensitive PII.” The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result from the release of the PII.

- 1) **“Protected PII”** is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial, and computer passwords.
- 2) **“Non-sensitive PII”** is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is standalone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a social security number, a date of birth, and mother’s maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

### REQUIREMENTS

All parties must ensure the privacy of all PII obtained from participants and to protect such information from unauthorized disclosure. All parties must ensure that PII used during their grant has been obtained in conformity with applicable Federal and state laws and policies governing the confidentiality of information.

All PII transmitted via e-mail or stored on external drives, internal hard drives, or cloud drives must be encrypted. All PII stored onsite and electronically must have limited access, be always kept safe from unauthorized individuals, and must be managed with appropriate information technology (IT) services.

Accessing, processing, and storing of PII data on personally owned equipment at off-site locations (e.g. employee's home, and non-grantee managed IT services, e.g. Yahoo mail, Gmail, etc.) is strictly prohibited.

All parties who will have access to sensitive/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards with which they must comply to protect the information, and that they may be liable to civil and criminal sanctions for improper disclosure.

Access to any PII obtained through the grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means. When communicating with Partner4Work staff, subrecipients should never send sensitive information over their normal email platform. All emails sent to Partner4Work staff containing PII must be through DeliverySlip, Partner4Work's secure email platform. The subrecipient should inform Partner4Work of all staff requiring DeliverySlip access.

Grantees must permit the Employment and Training Administration (ETA) and Partner4Work to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure that the grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, grantees must make records applicable to this agreement available to authorized persons for the purpose of inspection, review and/or audit.

Grantees must retain data received from ETA or Partner4Work only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal and Partner4Work records retention requirements, if any. Thereafter, the grantee agrees that all data will be destroyed, including deletion of electronic data.

**Additional Requirements:**

- 1) Before collecting PII or sensitive information from participants, have participants sign releases acknowledging the use of PII for grant purposes only.
- 2) Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
- 3) Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding) and securely deleting sensitive electronic PII.
- 4) Do not leave records containing PII open and unattended.
- 5) Store documents containing PII in locked cabinets when not in use.
- 6) Immediately report any breach or suspected breach of PII.

## COMPLAINT & GRIEVANCE PROCEDURES

The purpose of this section is to inform Partner4Work- funded program participants, staff, and partners of the procedures for filing a complaint or grievance alleging violations of programs and/or related policies and regulations.

### BACKGROUND

Federal law mandates the development of procedures for filing complaints and grievances submitted by participants affected by, and who allege, violations of the requirements of program regulations or policies. The Partner4Work Complaint and Grievance Policy applies to program complaints and complaints regarding training and career services/activities only. For example, participants may file specific complaints pertaining to particular service provider staff and/or program services, refusal of entry into program activities, and denial of support service funds.

Partner4Work is the appropriate organization of contact when the complaint specifically concerns Partner4Work-funded programs. Each funded service provider must adhere to this policy. Service providers must retain documentation on any customer complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

### POLICY

Program participants, staff, and/or other parties are encouraged to first seek an informal resolution at the service provider level regarding a complaint or grievance prior to filing a complaint with Partner4Work. Participants, staff, and/or other parties interested in filing a complaint with Partner4Work must follow the procedures below.

#### **Step 1: Opportunity to File a Complaint**

Individuals or entities seeking to file a written complaint to Partner4Work must complete the Partner4Work Complaint and Grievance Form, which is attached to this policy and available at [partner4work.org](http://partner4work.org). This form must be mailed or emailed to the following:

**Partner4Work Compliance Manager**

**650 Smithfield St**

**Centre City Tower, Suite 2400**

**Pittsburgh, PA 15222**

**[grievances@partner4work.org](mailto:grievances@partner4work.org)**

All complaints or grievances must be filed within **180 calendar days** of the alleged violation to be reviewed and considered by Partner4Work.

#### **Step 2: Opportunity for an Informal Resolution**

The Partner4Work Compliance Manager will notify the complainant, acknowledging receipt of the complaint, within 5 calendar days of receiving the complaint.

The Partner4Work Compliance Manager will schedule a meeting with the complainant to occur within 15 calendar days of receiving the complaint to attempt to reach an informal resolution between the parties. If an informal resolution can be reached, Partner4Work will request a written confirmation from the complainant verifying that they agree to the terms of the resolution. Partner4Work will notify all parties involved in writing that an informal resolution has been reached.

### **Step 3: Opportunity for a Hearing**

If Partner4Work is unable to reach an informal resolution with the complainant, the complainant will be provided the opportunity for a hearing to take place no later than 45 calendar days after the initial filing date of the complaint.

To ensure bias does not influence the outcome of a hearing, Partner4Work will perform an assessment of qualified staff. Upon conclusion, Partner4Work will appoint an impartial and qualified individual as the Hearing Officer to act as a mediator and attempt to resolve the issue(s) and render an independent decision. The Hearing Officer will send out a written notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard.

All parties have the right to be accompanied by an attorney (at their own expense), or other duly authorized representative. All parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued by the Hearing Officer to the complainant and all parties who attended the hearing within **60 calendar days** of the filing of the complaint. The decision will include: 1) a synopsis of the facts, 2) a statement of reasons for the decision, and 3) notification of records. All correspondence will be mailed certified with a return receipt requested.

### **Step 4: Commonwealth Grievance and Hearing Procedures**

If Partner4Work does not provide a written decision within 60 calendar days of receiving the complaint or either party involved receives a decision determined to be unsatisfactory, either party involved has the right to submit a local level appeal to the Commonwealth of Pennsylvania regarding the complaint in compliance with the Commonwealth of Pennsylvania's established procedures.

### **Information Requirements**

Program providers must make commercially reasonable efforts to ensure participants, staff, partners, and other parties affected by the local workforce development system are informed of the content and requirements of this policy. This includes providing information on this policy during program enrollment and displaying the information in this policy in a public space.

### **Labor Standards Violations**

If a collective bargaining agreement covering the parties to the grievance so provides, an individual alleging a labor standards violation may resolve the grievance through binding arbitration.

### **Important Disclaimers:**

- This policy does not address the procedures for processing complaints alleging discrimination under WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations, (29 CFR Part 38).
- This policy does not address the procedures for processing complaints for WIOA mandated partner programs outside of WIOA Title I Adult, Dislocated Worker, and Youth programs and the

WIOA one-stop operator. Such complaints should be made via the internal processes of those partner organizations/agencies.

- Nothing in this policy precludes a complainant from pursuing a remedy authorized under another federal, state, or local law.

## POLICY EXCEPTIONS

Under limited circumstances, Partner4Work may grant exceptions to requirements within this policy. Requests for exceptions may be submitted using the Policy Exception Request Form available 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.

## GLOSSARY OF TERMS

The following definitions apply to terms linked throughout this guide:

**Advanced Manufacturing:** The use of innovative technologies to create existing products and the creation of new products. Advanced manufacturing can include production activities that depend on information, automation, computation, software, sensing, and networking.

**Covered Person:** “Covered Person” – as defined in section 2(a) of the Jobs for Veterans Act (JVA) of 2008 means a veteran or eligible spouse. A veteran is defined as a person who served at least one day in the active military, naval, or air service and who was discharged under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

**Eligible Spouse:** “Eligible Spouse” - as defined in section 2(a) of the JVA means the spouse of any of the following individuals:

- 1) Any veteran who died of a service-connected disability;
- 2) Any member of the Armed Forces serving on active duty who, at the time of application for service under this section, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (I) missing in action; (II) captured in the line of duty by a hostile force or (III) forcibly detained or interned in line of duty by a foreign government or power;
- 3) Any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veterans Affairs;
- 4) Any veteran who died while having a disability, as indicated in bullet (3) of this definition was in existence.<sup>1</sup> A spouse whose eligibility is derived from a living veteran or service member (i.e., category 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

**Incumbent workers:** This term refers to individuals already employed, either with an employer partner or another employer, at program enrollment, but who need training to upgrade their skills to secure full-time

employment, advance in their careers, or retain their current positions in H-1B occupations and industries. The training provided to incumbent workers is either 1) developed in collaboration with an employer partner with which the individual is employed, or 2) for individuals who are employed at the time of enrollment by a non-partner employer, but who need additional skill training to improve their opportunities for middle- and high-skilled jobs in the target H-1B industries or occupations.

**Individual Employment Plan:** “Individual employment plan” (IEP) refers to an ongoing strategy jointly developed by the participant and the case manager that identifies the participant’s employment goal the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals.

**Individual Training Account:** An “individual training account” (ITA) is a funding mechanism through which eligible individuals can access quality training to help obtain employment in high demand occupations.

**Justice-Impacted:** For the purposes of this program, a “justice-impacted” individual is an adult or juvenile who:

- A. Is or has been subject to any stage of the criminal justice process, and who may benefit from training and employment services; or
- B. Requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

**On-the-Job Training:** “On-the-Job Training” (OJT) means training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the occupation;
- Provides reimbursement to the employer for the costs of providing the training and additional supervision related to the training; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained.

**Opportunity Youth:** Opportunity youth are young people who are between the ages of 16 to 24 years old and are disconnected from school and work.

**Participant:** A participant is any individual who is determined eligible for and receives a grant-funded service beyond a determination of eligibility.

**Priority of Service:** The term “Priority of Service” means, with respect to any qualified job training program, that a covered person shall be given priority over non-covered person for the receipt of employment, training and placement services provided under that program, notwithstanding any other provisions of the law.

**Smaller/Rural Communities:** For the purposes of this program smaller and rural communities include:

- 1) All non-metro counties;
- 2) All metro census tracts with Rural-Urban Commuting Area (RUCA) codes 4-10;
- 3) Large area metro census tracts of at least 400 square miles in area with population density of 35 or less per square mile with RUCA codes 2-3;
- 4) All outlying metro counties without an Urbanized Area (UA) to be rural; or
- 5) Any federally recognized Indian Tribe.

(See Health Resources & Services Administration (HRSA)'s Federal Office of Rural Health Policy (FORHP) at <https://www.hrsa.gov/rural-health/about-us/what-is-rural>)

**Underemployed workers:** This term refers to individuals who are not currently connected to a full-time job commensurate with the individual's level of education, skills, or wage and/or salary earned previously, or who have obtained only episodic, short-term, or part-time employment.

**Unemployed workers:** An unemployed worker is an individual who is without a job and is available to work.

## REFERENCES

### Eligibility

- 20 CFR Part 1010
- TEGL 10-09 (November 10, 2009)

### DOL Building Pathways to Infrastructure Jobs

- [FOA](#)
- [FAQs](#)
- NOA

### Supportive Services

- WIOA Section 3(59)
- 20 CFR §680.900

### Follow-Up Services

- TEGL 19-16 (March 1, 2017)
- TEGL 21-16 (March 2, 2017)
- WIOA 20 CFR § 678.430
- WIOA 20 CFR § 681.580
- WIOA Sec 129(c)(2)(I)
- WIOA Sec 134(c)(2)(A)(xiii)

### Training Services

- TEGL 19-16
- WIOA Section (3)(44)
- WIOA Section 134(c) (3)(H)
- 20 CFR 680.530
- 20 CFR 680.700
- 20 CFR 680.710
- 20 CFR 680.730
- 20 CFR 680.740
- 20 CFR 680.760
- 20 CFR 680.780-820

### Personally Identifiable Information

- TEGL 39-11

### Complaint & Grievance Procedures

- WIOA Final Rule 20 CFR § 683.600
- WIOA Section 181(c)

## Policy Updates

### Policy Exceptions

| <b>Date</b> | <b>Policy Update</b>  |
|-------------|---|
| 03/25/2026  | The link in this policy has been updated to direct users to the new request form. |