

# PARTNER WORK

## YOUTH REENTRY ON-THE-JOB TRAINING POLICY

### Purpose

The purpose of this policy is to articulate how On-the-Job (OJT) training funds are to be administered in Allegheny County/Pittsburgh under the PA Department of Labor & Industry- funded Young Adult Reentry Project (YARP).

### Affected Parties

This policy applies to all Allegheny County/Pittsburgh Youth Reentry participants who will participate in an OJT. This policy also applies to employers participating in an OJT.

Allegheny County/Pittsburgh Youth Reentry program staff and Partner4Work staff are responsible for implementing this policy.

### References

- 20 CFR 680.700
- 20 CFR 680.730
- Youth Reentry Grant NGA 2023

### Definition of Key Terms

“**On-the-Job Training**” 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.

### Participant Eligibility

An individual enrolled in Allegheny County/Pittsburgh Youth Reentry programming may qualify to participate in an OJT if it is determined by program staff that they meet the following criteria:

- A resident of the City of Pittsburgh and/or Allegheny County;
- After an interview, evaluation or assessment, and career planning, program 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; and
  - Has the skills and qualifications to participate successfully in training services.

## **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 is not full time, i.e. minimum of 32 hours per week.

### Employer Assurances

With assistance from Partner4Work 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) other than those 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 Pennsylvania state labor and workplace safety laws.
- The employer agrees to cooperate with monitoring efforts as required by the PA Department of Labor & Industry and adhere to all other applicable rules and regulations.
- Funds are not used to directly or indirectly assist, promote, or deter union organizing.
- The employer agrees to respond to Partner4Work 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.

## **OJT Program Requirements**

### Required Program Criteria

An OJT program must meet the following criteria to receive Youth Reentry funding:

- The training is provided by an employer to a paid participant while engaged in productive work in a job and the training must:

- Be aligned to an in-demand occupation or PA's HighPriority Occupation, or HPO, which targets industries identified as having the greatest opportunity for individuals to be fully trained and prepared for career-focused employment;
- Provide knowledge or skills essential to the full and adequate performance of the occupation; and
- Be limited in duration as appropriate to the occupation for which the participant is being trained. (See OJT Length below)

OJT contracts will generally not be written for low skill jobs that generally would require little or no training.

Occupational Eligibility

OJT dollars must be prioritized for programs leading to employment in a High Priority Occupation (HPO) and/or 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. Youth Reentry program staff should consult with the employer and utilize the Occupational Information Network's (ONET) Specific Vocational Preparation Range (SVP) to determine the appropriate occupational training needed.

Using the SVP provided by [ONET](http://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

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 \$8,000 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.

Youth Reentry program 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:** December 15, 2023